SYMBOL: SHERA **Date: August 14, 2026**
ISIN: INE0MM001019

To,
The Manager-Listing Department,
The National Stock Exchange of India Limited,
Exchange Plaza, NSE Building, Bandra Kurla
Complex, Bandra East, Mumbai – 400 051
Fax: 022-26598237, 022-26598238

Subject: Submission of Annual Secretarial Compliance Report for FY 2025-26 in connection with the requirement of migration to Main Board

Dear Sir/Madam,

Pursuant to applicable provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Kindly find the enclosed Annual Secretarial Compliance Report for the F.Y. 2025-26 of the Company issued by M/s S. K. Joshi & Associates, Practising Company Secretary as per the requirement of the migration of the Company from SME to Main Board of National Stock Exchange of India Limited (NSE).

This is for your information and records.

For SHERA ENERGY LIMITED

Jyoti Goyal
Digitally signed by Jyoti Goyal
Date: 2026.08.14 20:37:54 +05'30'

Jyoti Goyal
Company Secretary & Compliance Officer

Annual Secretarial Compliance Report of Shera Energy Limited for the financial year ended March 31, 2026

We, S.K. Joshi & Associates, Practicing Company Secretaries, having our office at 64, Udai Nagar B, Near Mansarovar Metro Station, Opp. Metro Pillar No. 7, Gopalpura Bypass, Jaipur-302019 have examined:

(a) all the documents and records made available to us and explanation provided by **Shera Energy Limited** (**"the listed entity"**),

(b) the filings/ submissions made by the listed entity to the stock exchanges,

(c) website of the listed entity,

(d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the financial year ended **March 31, 2026** (**"Review Period"**) in respect of compliance with the provisions of:

a) the Securities and Exchange Board of India Act, 1992 (**"SEBI Act"**) and the Regulations, circulars,guidelines issued thereunder; and

b) the Securities Contracts (Regulation) Act, 1956 (**"SCRA"**), rules made thereunder and the Regulations,circulars, guidelines issued thereunder by the Securities and Exchange Board of India (**"SEBI"**);

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, Includes: -

(a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; (hereinafter referred as **'Listing Regulations'**)

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable to the listed entity during the Review Period)**

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations,2011;

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018**; (Not applicable to the listed entity during the Review Period)**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations,2021; **(Not applicable to the listed entity during the Review Period)**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable to the listed entity during the Review Period)**

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;

(h) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; {**repealed w.e.f. December 16, 2025**}

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(i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2025 regarding the Companies Act and dealing with client to the extent of securities issued; {**notified on December 16, 2025**}

and based on the above examination, we hereby report that, during the Review Period:

a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters as specified below.

S. No.	Compliance Requirement (Regulations/ circulars /guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action taken by Company/ SE/SEBI	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
Nil										

b) The listed entity was not required to take any action with regard to compliance with observations made in previous reports as the same was not applicable.

S.No.	Observations/ Remarks of the Practicing Company Secretary	Observations made in the secretaries' compliance report for the year ended (the years are to be mentioned)	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of violation/ deviations and actions taken/penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
Not Applicable						

We hereby report that during the review period the compliance status of the listed entity with the following requirements:

Sr. No	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS
1.	**Secretarial Standards:** The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	None

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2.	**Adoption and timely updating of the Policies:** • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/ circulars/ guidelines issued by SEBI	Yes Yes	None None
3.	**Maintenance and disclosures on Website:** • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website	Yes Yes NA	None None None
4.	**Disqualification of Director:** None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013	Yes	None
5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** a) Identification of material subsidiary companies b) Requirements with respect to disclosure of material as well as other subsidiaries	NA NA	The Company has material subsidiary(ies). However, the provisions of Regulations 17 to 27 of the SEBI (LODR) Regulations, 2015 were not applicable during the period under review in terms of Regulation 15(2), the Company being listed on the SME Exchange.
6.	**Preservation of Documents:** The listed entity is preserving and maintaining records as		

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	prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	None
7.	**<u>Performance Evaluation:</u>** The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	NA	None
8.	**<u>Related Party Transactions:</u>** a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	None
	b) In case no prior approval has been obtained the listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee,	NA	The listed entity has obtained prior approval of the Audit Committee for related party transactions in compliance with applicable regulations.
9.	**<u>Disclosure of events or information:</u>** The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
10.	**<u>Prohibition of Insider Trading:</u>** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
11.	**<u>Actions taken by SEBI or Stock Exchange(s), if any:</u>** No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or)	Yes	No action was taken by SEBI or Stock Exchanges during review period.

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	The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	NA	
12	**Resignation of statutory auditors from the listed entity or its material subsidiaries** In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	Yes	The Listed Entity has complied with the disclosure requirements under Regulation 30 read with clause 7A of Para A of Part A of Schedule III of the SEBI (LODR) Regulations, 2015 in respect of the resignation of its statutory auditor.
13.	**Additional non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	No additional non-compliance has been observed.

We further, report that the listed entity does not have any Employee Benefit Scheme Document. Accordingly, disclosure requirements in terms of regulation 46(2) (za) of the LODR Regulations is not applicable during the reporting period.

Assumptions & Limitations of Scope and Review:

1. The Compliance with the applicable laws and ensuring the authenticity of documents and information furnished, are the sole responsibility of the management of the listed entity. The management of the Company is responsible for maintenance of proper records and for ensuring compliance with applicable laws, rules, regulations, circulars, and guidelines issued from time to time, including SEBI Regulations, and for establishing and maintaining adequate systems and controls to ensure such compliance.
2. Our responsibility is limited to certify compliance based on our examination of relevant documents and information. This engagement does not constitute an audit nor does it provide an expression of opinion or assurance.

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3. We have not conducted verification with respect to the correctness or appropriateness of the financial Records or the Books of Accounts of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the Listing Regulations required by the Listed entity in connection with its application for Migration from SME Platform to the Main Board of the Stock Exchange and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.
5. The interpretation of applicable regulations, circulars, and guidelines is based on the prevailing provisions during the period of review, and subsequent amendments have not been considered.
6. The Secretarial Compliance Report has been prepared in accordance with the Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India (ICSI), involving such examinations and verifications as were considered necessary and appropriate for the purpose.
7. The scope of review is subject to the availability of information and timely cooperation received from the management of the listed entity.

For S.K. Joshi & Associates
Company Secretaries
ICSI Unique Code P2008RJ064900
Peer Review No. 1659/2022

Place: Jaipur
Date: July 21, 2026

S.K. Joshi & Associates Company Secretaries CS

CS Sanjay Kumar Joshi
Partner
FCS 6745, C P No.: 7342
UDIN: F006745H000905478