

Date: 23rd May, 2025

To
The Manager
BSE Limited
Phiroze Jeejee bhoy
Towers 25th Floor, Dalal
Street Mumbai – 400001

To
The Manager
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block
G, Bandra Kurla Complex,
Bandra(E), Mumbai-400051

BSE Scrip Code- 526987

NSE Symbol –URJA

Dear Sir/Madam,

Subject: Annual Secretarial Compliance Report for the year ended 31st March, 2025.

In pursuance to the applicable clauses of Regulation 24A of SEBI Obligations and Disclosure (Listing Obligations and Disclosure Requirements) Regulations, please find enclosed herewith Annual Secretarial Compliance Report issued by M/s Siddiqui & Associates, Company Secretary in Practice for the financial year ended March 31, 2025.

We request you to take the same on record

Thanking You

For URJA GLOBAL LIMITED

Mohan Jagdish Agarwal
Managing Director

Siddiqui & Associates

Company Secretaries

Phone 011-41401301 Mobile 98110-35621 Email info@siddiassociates.com; primekoss@hotmail.com

Website: <http://www.siddiassociates.com>

Annual Secretarial Compliance Report of Urja Global Limited

(For the Financial year ended 31st March 2025)

[Pursuant to Regulation 24A of SEBI (LODR), Regulations, 2015 & SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019. & NSE Circular Ref No: NSE/CML/ 2023/30 dated April 10, 2023]

I, K. O. Siddiqui, Practicing Company Secretary have examined:

- All the documents and records made available to us and explanation provided by **Urja Global Limited** ("the listed entity") having CIN Number **L67120DL1992PLC048983**.
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/ filing, as may be relevant, which has been relied upon to make this Report.

for the year ended **31st March 2025** in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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, include: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable for the year ended 31st March 2025**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable for the year ended 31st March 2025**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable for the year ended 31st March 2025**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Other regulations as applicable and circulars/ guidelines issued thereunder



And based on the above examination, I hereby report that, during the Review period the compliance status of the listed entity is appended as below:

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

S. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	As per Regulation 4(1)(c) 4(1)(d), 4(1)(e), 4(1)(g), 4(1)(h), 4(1)(i) and 4(1)(j) of SEBI LODR Regulations the listed entity shall refrain from misrepresentation and ensure that the information on provided to recognised stock exchange(s) and investors is not misleading, The listed entity shall provide adequate and timely information to recognised stock	Section 15HB of SEBI Act, 1992 for the alleged violation of Reg. 4(1)(c), 4(1)(d), 4(1)(e), 4(1)(g), 4(1)(h), 4(1)(i) and 4(1)(j) of LODR Regulations; Regulation 30(2) of LODR Regulations; Regulation 30(2) of LODR Regulations read with SEBI Circular dated Sep 09, 2015; Regulation 17(7) of LODR	Non-compliance of Reg. 4(1)(c), 4(1)(d), 4(1)(e), 4(1)(g), 4(1)(h), 4(1)(i) and 4(1)(j) of LODR Regulations; Regulation 30(2) of LODR Regulations read with SEBI Circular dated Sep 09, 2015; Regulation 17(7) of LODR	Securities and Exchange Board of India	Adjudication Order under Section 15-I of the Securities and Exchange Board of India Act, 1992 read with Rule 5 of the Securities and Exchange Board of India (Procedure for Holding Inquiry and Imposing Penalties) Rules,	Alleged violation under Section 15HB of SEBI Act, 1992 for the alleged violation of Reg. 4(1)(c), 4(1)(d), 4(1)(e), 4(1)(g), 4(1)(h), 4(1)(i) and 4(1)(j) of LODR Regulations; Regulation 30(2) of LODR Regulations read with SEBI Circular dated Sep 09, 2015; Regulation 17(7) of LODR Regulations read with Schedule II	Rs. 40,00,000	NIL	After require discussion, an appeal has been filed with Securities Appellate Tribunal, Mumbai Branch by the company	Acknowledged



exchange(s) and investors, The listed entity shall ensure that dissemination made under provisions of these regulations and circulars made thereunder, are adequate, accurate, explicit, timely and presented in a simple language, The listed entity shall abide by all the provisions of the applicable laws including the securities laws and also such other guidelines as may be issued from time to time by the Board and the recognised stock exchange(s) in this regard and as may be applicable, The	Sep 09, 2015; Regulation 17(7) of LODR Regulations read with Schedule II of LODR Regulations; Regulation 34(3) of LODR Regulations; Regulation 30(7) of LODR Regulations and under Section 15HA of SEBI Act, 1992 for the alleged violation of Reg 3 (a), (b), (c), (d) and 4 (1), 4(2)(k) and (r) read with Reg. 2(1)(b) and 2(1)(c) of SEBI (PFUTP) Regulations, 2003 and under Section 15A(a) and 15A(b) of SEBI Act, 1992 for the alleged violation of 4(1)(c), 4(1)(d), 4(1)(e), 4(1)(g), 4(1)(h), 4(1)(i) and 4(1)(j) of LODR Regulations	ions read with Schedule II of LODR Regulations; Regulation 34(3) of LODR Regulations; Regulation 30(7) of LODR Regulations and Reg 3 (a), (b), (c), (d) and 4 (1), 4(2)(k) and (r) read with Reg. 2(1)(b) and 2(1)(c) of SEBI (PFUTP) Regulations, 2003	1995	of LODR Regulations; Regulation 34(3) of LODR Regulations read with Schedule V of LODR Regulations; Regulation 30(7) of LODR Regulations and under Section 15HA of SEBI Act, 1992 for the alleged violation of Reg 3 (a), (b), (c), (d) and 4 (1), 4(2)(k) and (r) read with Reg. 2(1)(b) and 2(1)(c) of SEBI (PFUTP) Regulations, 2003 and under Section 15A(a) and 15A(b) of SEBI Act, 1992 for the alleged violation of 4(1)(c), 4(1)(d), 4(1)(e), 4(1)(g), 4(1)(h), 4(1)(i) and 4(1)(j) of LODR Regulations				
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<p>listed entity shall make the specified disclosures and follow its obligations in letter and spirit taking into consideration the interest of all stakeholders, Filings, reports, statements, documents and information which are event based or are filed periodically shall contain relevant information and Periodic filings, reports, statements, documents and information reports shall contain information that shall enable investors to track the performance of a listed entity over regular intervals of time and</p>	<p>and (r) read with Reg. 2(1)(b) and 2(1)(c) of SEBI (PFUTP) Regulations, 2003 and under Section 15A(a) and 15A(b) of SEBI Act, 1992 for the alleged violation of 4(1)(c), 4(1)(d), 4(1)(e), 4(1)(g), 4(1)(h), 4(1)(i) and 4(1)(j) of LODR Regulations</p>									
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shall provide sufficient information to enable investors to assess the current status of a listed entity respectively As per Regulation 30(2) of SEBI LODR Regulations, Events specified in Para A of Part A of Schedule III are deemed to be material events and listed entity shall make disclosure of such events. As per Regulation 17(7) of SEBI LODR Regulations requires the minimum information to be placed before the board of directors is specified in Part A of Schedule II. As per Regulation 34(3) of LODR Regulations The annual report shall contain any other									
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disclosures specified in Companies Act, 2013 along with other requirements as specified in Schedule V of these regulations. As per Regulation 30(7) of LODR Regulations The listed entity shall, with respect to disclosures referred to in this regulation, make disclosures updating material development s on a regular basis, till such time the event is resolved/closed, with relevant explanations. As per Regulation 3(a) (b), (c), (d) of SEBI (PFUTP) Regulations, 2003 No person shall directly or indirectly: buy, sell or otherwise deal in securities in a fraudulent										
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manner; Use or employ, in connection with issue, purchase or sale of any security listed or proposed to be listed in a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of the Act or the rules or the regulations made there under; employ any device, scheme or artifice to defraud in connection with dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange; engage in any act, practice, course of business which operates or									
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would operate as fraud or deceit upon any person in connection with any dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange in contravention of the provisions of the Act or the rules and the regulations made there under respectively. As per Regulation 4 (1), 4(2)(k) and (r) read with Reg. 2(1)(b) and 2(1) (c) of SEBI (PFUTP) Regulations, 2003 Without prejudice to the provisions of regulation 3, no person shall indulge in a fraudulent or an unfair trade practice in securities markets, Dealing in									
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securities shall be deemed to be a manipulative fraudulent or an unfair trade practice if it involves; disseminating information or advice through any media, whether physical or digital, which the disseminator knows to be false or misleading in a reckless or careless manner and which is designed to, or likely to influence the decision of investors dealing in securities and knowingly planting false or misleading news which may induce sale or purchase of securities									
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b. The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended 31 st March 2025	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
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1.	The Company has filed the clarification to the exchange and later on paid the fine amount.	NIL	As per Regulation 34(1) of SEBI LODR The listed entity shall submit to the stock exchange and publish on its website- (a) a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders (b) in the event of any changes to the annual report, the revised copy along with the details of and explanation for the changes shall be sent not later than 48 hours after the annual general meeting	Non-compliance of Regulation 34 SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 regarding delay in submission of the Annual Report within the period.	The Company has filed the clarification to the exchange and later on paid the fine amount.	NIL
2.			As per Regulation 43A of SEBI LODR The top 1000 listed entities based on market capitalization shall formulate a dividend distribution	Non-compliance of Regulation 43A SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 regarding Non-disclosure of Dividend	The Company has filed the clarification to the exchange and later on paid the fine amount.	NIL



			policy which shall be disclosed on the website of the listed entity and a web-link shall also be provided in their annual reports.	Distribution Policy in the Annual Report and on the websites of the Company.		
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I hereby report that, during the review period the compliance status of the Listed Entity with the following requirements

S. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/ 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 India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	NIL
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> 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	NIL
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> 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 Yes	NIL
4.	Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	NIL
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: <ul style="list-style-type: none"> a. Identification of material subsidiary companies. b. Disclosure requirement of material as well as other subsidiaries. 	Yes Yes	NIL



6.	Preservation of Documents: The listed entity is preserving and maintaining records as 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	NIL
7.	Performance Evaluation: 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.	Yes	NIL
8.	Related Party Transactions: a. The listed entity has obtained prior approval of Audit Committee for all related party transactions; or b. The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.	Yes Yes	NIL
9.	Disclosure of events or information: 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	NIL
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	NIL
11.	Actions taken by SEBI or Stock Exchange(s), if any: 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 except as provided under separate paragraph herein (**).	Yes	NIL
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.	Not Applicable	NIL
13.	Additional Non-Compliance, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NO	NIL



Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 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

Place New Delhi
Date: 17th May 2025



For Siddiqui & Associates
Company Secretaries

K. O. Siddiqui
FCS 2229; CP 1284

UDIN: F002229G000370091

Peer Review Certificate No. 2149/2022

Firm Registration No. S1988DE004300

K.O. SIDDIQUI
FCS 2229; CP1284
SIDDQUI & ASSOCIATES
COMPANY SECRETARIES
D-49, SARITA VIHAR
NEW DELHI-110 076