

# BALRAJ SHARMA & ASSOCIATES

## COMPANY SECRETARIES

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**Secretarial Compliance Report of Camac Commercial Company Limited for the financial year ended 31stMarch, 2025**

**(Pursuant to Regulation 24A of the SEBI (LODR) Regulations, 2015 read with various circulars issued by SEBI)**

To,  
The Board of Directors  
Camac Commercial Company Limited  
1st Floor, Express Building,  
9-10 Bahadur Shah Zafar Marg,  
New Delhi- 110002

We have conducted the review of compliance of the applicable statutory provisions and the adherence to good corporate practices by Camac Commercial Company Limited (hereinafter referred as 'the listed entity'), having its Registered Office at 1st Floor, Express Building, 9-10, Bahadur Shah Zafar Marg, New Delhi- 110002. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Compliance Audit, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended March 31, 2025, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I, Varun Sharma, Partner of M/s Balraj Sharma & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Camac Commercial Company Limited ("**the listed entity**"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,



	including specific clause)									
Not applicable during the review period										

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31st March, 2024	Compliance Requirements (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
1.	The Order of SEBI has been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023	The Order of SEBI has been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023	Regulation 31(1)(b) of LODR Regulations read with SEBI circular no. CIR/CFD/CMD/13/2015 dated November 30, 2015 read with Regulation 2(za) of ICDR Regulations and clause 35 of the equity listing agreement	Alleged to include certain individuals in the category of promoter  Penalty- INR 1.00 crore	SEBI Order was challenged by the Company before the SAT and vide its Orders passed on 26th April 2023, SAT had stayed the effect and operation of the said SEBI Orders subject to payment of 25% of the levied	The matter is subjudice as on date.

					penalty(ies) by the Company. The payment for the said 25% penalty has been made to SEBI by the Company. The SAT appeals are sub-judice as on date.	
	The Order of SEBI has been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023	The Order of SEBI has been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023	Rule 19A(1) of SCRR 1957 read with regulation 38 of LODR read with provision of 2(II) of SEBI circular no. CIR/CFD/DIL/10/2010 dated December 16, 2010 read with SEBI circular no. CIR/CFD/CMD/14/2015 dated November 30, 2015	Alleged for Non-compliance of Minimum Public shareholding  Penalty- INR 5.00 crore	SEBI Order was challenged by the Company before the SAT and vide its Orders passed on 26 <sup>th</sup> April 2023, SAT had stayed the effect and operation of the said SEBI Orders subject to payment of 25% of the levied penalty(ies) by the Company. The payment for the said 25% penalty has been made to SEBI by the Company. The SAT appeals are sub-judice as on date.	The matter is subjudice as on date.

	The Order of SEBI has been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023.	The Order of SEBI has been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023.	Section 12A(a) and (b) of SEBI Act, 1992 read with regulation 3(b) and (C) and 4(1) of PFUTP Regulations	Alleged improper disclosure thereby Defrauding the Shareholders Penalty- INR 5.00 crore	SEBI Order Was challenged by the Company before the SAT and vide its Orders passed on 26 <sup>th</sup> April 2023, SAT had stayed the effect and operation of the said SEBI Orders subject to payment of 25% of the levied penalty(ies) by the Company. The payment for the said 25% penalty has been made to SEBI by the Company. The SAT appeals are sub-judice as on date.	The matter is subjudice as on date.
2.	<b>Adjudication order in the matter of PNB Finance and Industries Limited</b>					
	The Order of SEBI has Been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023.	The Order of SEBI has been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023.	Regulation 30(2) of SAST Regulations, 2011 and Regulation 7(1)(a) of PIT Regulations, 2015	Alleged to disclose their shareholding as Promoter.  Penalty- INR 21 Lakhs	SEBI Order was Challenged by the Company before the SAT and vide its Orders passed on 26 <sup>th</sup> April 2023,	The matter is subjudice as on date.

					<p>SAT had stayed the effect and operation of the said SEBI Orders subject to payment of 25% of the levied penalty(ies) by the Company.</p> <p>The payment for the said 25% penalty has been made to SEBI by the Company. The SAT appeals are sub-judice as on date.</p>	
	<p>The Order of SEBI has been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023.</p>	<p>The Order of SEBI has been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023.</p>	<p>clause 2(11) of SEBI Circular no. CIR/CFD/DIL/10/2010 dated December 16, 2010 read with SEBI circular no. CIR/CFD/CMD/14/2 015 dated November 30, 2015.</p>	<p>Alleged to Comply with MPS Norms Penalty- INR 20 Lakhs</p>	<p>SEBI Order was Challenged by the Company before the SAT and vide its Orders passed on 26<sup>th</sup> April 2023, SAT had stayed the effect and Operation of the said SEBI Orders subject to payment of 25% of the levied penalty(ies) by the Company.</p>	<p>The matter is subjudice as on date.</p>

					<p>The payment for the said 25% penalty has been made to SEBI by the Company. The SAT appeals are sub-judice as on date.</p>	
	<p>The Order of SEBI has been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023.</p>	<p>The Order of SEBI has Been challenged in SAT by the Company and SAT has put a stay on the operations of the said SEBI order vide its order dated April 26, 2023.</p>	<p>Section 12 A(a) and (b) of SEBI Act, 1992 read with Regulations 3(b), (c) and 4(1) of PEUTP Regulations.</p>	<p>Alleged for Defrauding the shareholders Through wrongful disclosure of shareholding of the Company. Penalty- INR 1 Crore Only</p>	<p>SEBI Order was challenged by the Company before the SAT and vide its Orders passed on 26<sup>th</sup> April 2023, SAT had stayed the effect and operation of the said SEBI Orders subject to payment of 25% of the levied penalty(ies) by the Company.</p> <p>The payment for the said 25% penalty has been made to SEBI by the Company. The SAT appeals</p>	<p>The matter is subjudice as on date.</p>

					are sub-judice as on date	
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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.	<b>Secretarial Standards:</b>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	
2.	<b>Adoption and timely updation of the Policies:</b>  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	
3.	<b>Maintenance and disclosures on Website:</b>  The Listed entity is maintaining a functional website  Timely dissemination of the documents/	Yes	



	<p>information under a separate section on the website.</p> <p>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website</p>	<p>Yes</p> <p>Yes</p>	
4.	<p><b>Disqualification of Director:</b></p> <p>None of the Director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity</p>	<p>Yes</p>	
5.	<p><b>Details related to Subsidiaries of listed entities have been examined w.r.t.</b></p> <p>(a) Identification of material subsidiary companies</p> <p>b) Disclosure requirement of material as well as other subsidiaries</p>	<p>NA</p>	<p>The management had identified that during the period under review, there was no Material Subsidiary Company</p>
6.	<p><b>Preservation of Documents:</b></p> <p>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.</p>	<p>Yes</p>	
7.	<p><b>Performance Evaluation:</b></p> <p>The listed entity has conducted performance</p>		



	promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.		settled by SEBI vide Settlement Orders Dt. September, 7, 2022. Orders against the remaining 2 SCN's were issued by SEBI on March, 28, 2023. Both the Adjudication Orders were challenged by the Company before the Securities Appellate Tribunal (SAT) and vide its Orders passed on 26 <sup>th</sup> April 2023, SAT had stayed the effect and operation of the said SEBI Orders subject to payment of 25% of the levied penalty(ies) by the Company.  The payment for the said 25% penalty has been made to SEBI by the Company. The SAT appeals are sub-judice as on date.
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	N.A.	There was no case of resignation of statutory auditors from the listed entity or its material subsidiaries during the Financial Year ended 31 <sup>st</sup> March, 2025

	Regulations by listed entities.		
13.	<b>Additional Non-compliances, if any:</b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. except as reported above	N.A.	No additional non-compliance observed for any SEBI regulation/circular/guidance note

We further, report that the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations are not applicable to the listed entity.

**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 Accounts of the listed entity.

4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.

**For Balraj Sharma & Associates  
Company Secretaries**

**(Varun Sharma)  
Partner  
ACS-21011,CP-26768  
UDIN: A021011G000451221**

**PR Certificate: 6262/2024**

**Date: 27/05/2025  
Place: New Delhi**