Mehak Gupta & Associates
COMPANY SECRETARIES

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Form No. MR-3
SECRETARIAL AUDIT REPORT
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2026
[Pursuant to Section 204(1) of the Companies Act, 2013 and Rule 9 of the Companies (Appointment and Remuneration Personnel) Rules, 2014]

To
The Members
Jagan Lamps Limited
Narela Piao-Manihari Road,
Kundli-131028, District-Sonipat, Haryana

I, Mehak Gupta, Proprietor of Mehak Gupta & Associates, Company Secretaries, have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by Jagan Lamps Limited (CIN- L31501HR1993PLC033993) (hereinafter called the "**Company**"). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, Managing Director, its officers, agents and authorized representatives during the conduct of Secretarial Audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on March 31, 2026, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the records provided by the Company and returns filed with the respective authorities' upto the time of signing of this report, according to the provisions of:

(i) The Companies Act, 2013 (as amended) ('**the Act**') and the rules made there under;
(ii) Secretarial Standard-1 ('**SS-1**') and Secretarial Standard-2 ('**SS-2**') issued by the Institute of Company Secretaries of India;
(iii) Listing agreement entered into by the Company with the BSE Limited;
(iv) The Securities Contracts (Regulation) Act, 1956 ('**SCRA**') and the rules made there under;
(v) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;
(vi) Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;
(vii) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('**SEBI Act**'):-
   a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (as amended);
   b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (as amended);
   c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (as amended); - **(Not applicable to the Company during the audit period)**.

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d) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the Company during the audit period)**.
e) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **- (Not applicable to the Company during the audit period).**
f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Act and dealing with client;
g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; - **(Not applicable to the Company during the audit period)** and
h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - **(Not applicable to the Company during the audit period).**
i) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015 ('**SEBI (LODR) Regulations, 2015**');
j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

(viii) I further report that, having regards to the compliance system prevailing in the Company and on examination of the relevant documents and records in pursuance thereof, on test check basis, the Company has complied with the provisions of Labour Laws, Environmental Laws and other related Industry specific laws to the extent applicable to the Company.

During the audit period, the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above.

The BSE Limited vide its email dated May 05, 2025, had imposed consolidated penalty (for previous financial years) of Rs. 85,22,397/- for late/non-compliance of Regulation 27(2) (Corporate Governance), Regulation 31 (Shareholding Pattern), Regulation 33 (Financial Results) and Regulation 34 (Annual Report), of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. Intimation of the above under regulation 30 of SEBI (LODR), 2015 was submitted by the Company on May 06, 2025. Further, an appeal was filed by the Company before the Securities Appellate Tribunal ("SAT") against the decision/order dated May 05, 2025 passed by BSE Limited whereby the waiver application of the Company was rejected and penalties amounting to Rs. 85,22,397/- along with additional fines were imposed for alleged non-submission and delayed submissions under various provisions of the SEBI (LODR) Regulations, 2015. Subsequently, on January 23, 2026, the BSE granted a partial waiver of the penalties. Pursuant thereto, Company paid the fine amount of Rs. 12,06,397/- on February 10, 2026 and the residual payment was made on April 01, 2026. After payment of the fine amount, the Company sought leave to withdraw the Appeal before Securities Appellate Tribunal. Accordingly, the Tribunal, vide order dated April 02, 2026, dismissed the Appeal as withdrawn.

I further report that

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. During the period under review, change in the composition of the Board of Directors were made in due compliance of the Act and SEBI (LODR) Regulations, 2015.

Adequate notice has been given to all Directors to schedule the Board Meetings/Committee Meetings during the financial year under review, agenda and detailed notes on agenda were sent generally at least seven days in advance to all the Directors and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting. On inspection of the minutes as captured and recorded it was ascertained that all the decisions of the Board and Committees' Meetings were unanimous and there were no dissenting views.

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I further report that, based on the review of the compliance reports and the certificates of the Company Executive and taken on record by the Board of Directors of the Company, in my opinion there are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines. The Company is generally regular in filing of e-forms with the Registrar of Companies within the time prescribed under the Act.

I further report that during the audit period, there was no specific event/action having a major bearing on Company's affairs in pursuance of the above referred laws, rules, regulations, guidelines, standards, etc, except as mentioned above.

I further have to state that:

1. Maintenance of secretarial record is the responsibility of the management of the Company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. I have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the Secretarial records. The verification was done on test check basis to ensure that correct facts are reflected in Secretarial records. I believe that the process and practices, we followed provide a reasonable basis of my opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Where-ever required, I have obtained the Management representation about the Compliance of laws, rules and regulations and happening of events etc.
5. The Compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of procedure on test check basis.
6. The Secretarial Audit report is neither an assurance as to the future viability of the Company nor of the efficiency or effectiveness with which the management has conducted the affairs of the Company.

For Mehak Gupta & Associates
Company Secretaries

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Mehak Gupta
Proprietor
M. No.: FCS-10703
COP No.: 15013
Peer Review No. 1643/2022

UDIN: F010703H000486961

Place: New Delhi
Date: 26.05.2026