

Date: May 27, 2025

To,

BSE Limited
Listing Department
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400001.

Attn: Listing Department

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2025
Ref: Agribio Spirits Limited (Formerly known as Beekay Niryat Limited) (Scrip Code: 539546)

Dear Sir / Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015, please find enclosed copy of **Annual Secretarial Compliance Report** dated May 26, 2025, for the year ended **March 31, 2025**, issued by **M/s. Abhishek S. & Associates**, Practicing Company Secretaries.

Kindly take the same on record.

Thanking you.

Yours Faithfully,

For Agribio Spirits Limited
(Formerly known as Beekay Niryat Limited)

Ratan
Singh

Digitally signed
by Ratan Singh
Date: 2025.05.27
12:26:10 +05'30'

Ratan Singh
(Managing Director)
DIN: 06818520



**SECRETARIAL COMPLIANCE REPORT OF
AGRIBIO SPIRITS LIMITED (Formerly known as Beekay Niryat Limited)
CIN: L11010RJ1975PLC045573
FOR THE YEAR ENDED MARCH 31, 2025**

[Pursuant to Regulation 3(b) of the SEBI Circular No CIR / CFD/CMDI/ 27 / 2019 dated February 08, 2019 under SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]

I "ABHISHEK SHARMA", COMPANY SECRETARY IN WHOLE TIME PRACTICE, have examined:

- a) all the documents and records made available to us and explanation provided by "AGRIBIO SPIRITS LIMITED (Formerly Known as BEEKAY NIRYAT LIMITED)" (CIN: L11010RJ1975PLC045573) having its Registered Office at 111, Signature Tower, DC 2, Lal Kothi Scheme, Tonk Road, Jaipur -302015 RJ ("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 Report, for the year ended March 31, 2025 ("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, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Share 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) 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;



- (h) Securities and Exchange Board of India (Registrar to an issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and Circular/guidelines issued thereunder;
- (j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;
(Not applicable during the review period)
- (k) Other Regulations as applicable.

And circulars/ guidelines issued thereunder; 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.
- (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 in the previous reports	Observations made in the secretarial 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						

- (c) We 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.	<u>Secretarial Standards:</u> 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	—
2.	<u>Adoption and timely Updation of the Policies:</u> a) All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities b) All the policies are in conformity with SEBI Regulations and have been reviewed updated on time, as per the regulations/circulars/guideline	YES	—



	issued by SEBI.		
3.	<u>Maintenance and disclosures on Website:</u> a) The listed entity is maintaining a functional website. b) Timely dissemination of the documents/information under a separate section on the website c) 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	YES	-
4.	<u>Disqualification of Director:</u> None of the Directors of the Company was disqualified under Section 164 of the Companies Act, 2013	YES	-
5.	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> a) Identification of material subsidiary companies b) Requirement with respect to disclosure of material as well as other subsidiaries	NA	-
6.	<u>Preservation of Documents:</u> 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	-
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 as prescribed in SEBI Regulations.	YES	-
8.	<u>Related Party Transactions:</u> (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	YES	-



	obtained		
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosures under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder	YES	-
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with of SEBI (Prohibition of insider Trading) Regulation 3(5) & 3(6) Regulations, 2015.	YES	-
11.	<u>Action taken by SEBI or Stock Exchanges, if any:</u> Actions 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.	NA	No action was initiated by SEBI or Stock Exchanges.
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> 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.	NA	There was no resignation of statutory auditor in the listed entity during the review period.
13.	<u>Additional non compliances, if any:</u> Any additional non-compliance observed for all SEBI Regulations/circulars/guidance notes, etc.	NA	There are no additional non-compliances observed in 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.



ABHISHEK S & ASSOCIATES

Practicing Company Secretaries

2ND Floor, S/5-6, Janta Store Circle,

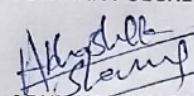
Bapu Nagar, Jaipur - 302015

Ph: +91 (8209961897)

Email: csabhishekjaipur@gmail.com

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 ABHISHEK S & ASSOCIATES
COMPANY SECRETARIES


ABHISHEK SHARMA
PROPRIETOR
FCS - A59433
COP - 25039



Place: Jaipur

Date: 26.05.2025

UDIN: A059433G000439967