



**Date: 30-05-2025**

**To,  
Corporate Relationship Department,  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai-400001.**

Ref: **Scrip Code- 524636**

Dear Sir/Madam,

**Sub: Submission of Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Please find enclosed herewith the Secretarial Compliance Report for the Financial Year ended March 31, 2025 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Kindly take the above information on your record.

Thanking you,

Yours Sincerely,

**For Oxygenta Pharmaceutical Limited.**

**Dolly Lakhichand Mandhan  
Company Secretary & Compliance Officer  
M.No.: A66040**



**Secretarial Compliance Report of Oxygenta Pharmaceutical Limited**  
**For the Financial Year ended March 31, 2025**

To,  
The Board of Directors,  
**Oxygenta Pharmaceutical Limited**  
Survey No.252/1, Aroor village, Sadasivapet Mandal,  
Medak District, Medak, Telangana, India.

I. I, N Vanitha, Practising Company Secretary, have examined:

- (a) all the documents and records made available to us and explanations provided by **Oxygenta Pharmaceutical Limited (the 'Company')** having its Registered Office at Survey No.252/1, Aroor village, Sadasivapet mandal, Medak District, Medak, Telangana, India and Corporate Office at Plot No 43 The Park View 1st Floor, Lumbini Avenue, Gachibowli, K.V. Rangareddy, Seri Lingampally, Telangana, India, 500032. (hereinafter referred to as **"the listed entity"**),
- (b) the filings/ submissions made by the listed entity to the Stock Exchange,
- (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 year ended 31.03.2025 ("01.04.2024 to 31.03.2025") 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 any amendment issued thereto; 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");
- (c) The Depositories Act, 1996:

II. 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;
- 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; **(Not applicable to the Company during the review period).**
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the Company during the review period).**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable to the Company during the review period).**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; and circulars/ guidelines issued thereunder;
- Circulars, Master Circulars/ guidelines issued there under.

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 specified below: -

Sr. 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 Practising Company Secretary	Management Response	Remarks
1.	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	NA

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



Sr. No.	Observations/ Remarks of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report made in the year ended 31st March, 2024	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation/ deviations and action 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.	NIL	<p>Board of directors of the company in their Board meeting held on October 11, 2023 Appointed Ms. Dolly Mandhan as the Company Secretary and Compliance Officer of the Company w.e.f. October 01, 2023.</p> <p>The Company had Submitted the Intimation of Appointment of The Company Secretary and Compliance officer to BSE within 12 hours post the Conclusion of the of the Board Meeting.</p> <p>The Company had received the advisory letter from BSE stating, disclosure of appointment of Company Secretary and Compliance Officer shall be given with 12 hours of appointment date.</p>	<p>Regulation 30 of SEBI (LODR) Regulations, 2015 read within their Board Schedule III, SEBI Circular SEBI/HO/CF D/CFD-PoD1/P/CIR/2023 dated July 13, 2023 and SEBI Circular SEBI/HO/CF D/PoD2/CIR/P/2023/1 dated July 11, 2023.</p> <p>the Listed Entity shall submit disclosure of the appointment of the Company Secretary and Compliance Officer within 12 hours of appointment date.</p>	<p>Board of directors of the company in their Board meeting held on October 11, 2023 Appointed Ms. Dolly Mandhan as the Company Secretary and Compliance Officer of the Company w.e.f. October 01, 2023 and the Company had Submitted the Intimation of Appointment of the Company Secretary and Compliance officer to BSE within 12 hours post the Conclusion of the Board Meeting instead of disclosure of the appointment of the Company Secretary and Compliance Officer within 12 hours of appointment date.</p>	<p>The Company had received the advisory letter from BSE stating, disclosure of appointment of Company Secretary and Compliance Officer shall be given with 12 hours of appointment date.</p> <p>The Company had Submitted the Intimation of Appointment of The Company Secretary and Compliance officer to BSE within 12 hours post the Conclusion of the Company Meeting.</p> <p>The Board of Directors of the Company and Directors of the Company at their meeting held on May 30, 2024 have taken note of the BSE advisory letter dated April 23, 2024 and affirmed to adhere the compliance of the SEBI Circulars and the Regulations as issued and amended from time to time.</p>	<p>BSE has issued advisory letter dated April 23, 2024, advising the Company to adhere to the disclosure requirements of the SEBI Circulars and the Regulation and submit the revised disclosures on immediate basis (if not submitted already). Also, the Company is advised to be careful in future to avoid recurrence of such lapses and exercise due diligence while submitting disclosures to the Stock Exchange.</p> <p>As per the information and explanation provided by the Company, the Board of Directors of the Company at their meeting held on May 30, 2024 have taken note of the BSE advisory letter dated April 23, 2024 and affirmed to adhere the compliance of the SEBI Circulars and the Regulations as issued and amended from time to time.</p>

(c) we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

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



2.	<b><u>Adoption and timely updation of the Policies:</u></b> <ul style="list-style-type: none"><li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity.</li><li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI.</li></ul>	Yes	None
3.	<b><u>Maintenance and disclosures on Website:</u></b> <ul style="list-style-type: none"><li>• The Listed entity is maintaining a functional website</li><li>• Timely dissemination of the documents/ information under aseparate section on the website</li><li>• 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.</li></ul>	Yes	None
4.	<b><u>Disqualification of Directors:</u></b> <p>None of the Directors of the Company is disqualified under Section 164 of Companies Act, 2013</p>	Yes	None
5.	<b><u>Details related to Subsidiaries of listed entities:</u></b> <p>(a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	N.A (The listed entity does not have any subsidiaries or material subsidiary)	None
6.	<b><u>Preservation of Documents:</u></b> <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 LODR Regulations, 2015.</p>	Yes	None
7.	<b><u>Performance Evaluation:</u></b> <p>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.</p>	Yes	None



8.	<b><u>Related Party Transactions:</u></b> a) The listed entity has obtained prior approval of Audit Committee for all related party transactions.	Yes	None
	b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.	N.A	Refer point 8(a) above
9.	<b><u>Disclosure of events or information:</u></b> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, within the time limits prescribed thereunder.	Yes	None
10.	<b><u>Prohibition of Insider Trading:</u></b> The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	<b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b> No Actions taken against the listed entity/ its promoters/ directors/ <del>subsidiaries</del> 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.	Yes	N.A
12.	<b><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></b> In case of resignation of statutory auditor from the listed entity <del>or any of its material subsidiaries</del> during the financial year, the listed entity <del>and/ or its material subsidiary (ies)</del> has <del>/have</del> 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.	N.A (Refer Note below)	N.A
13.	<b><u>No additional non-compliances observed:</u></b> No additional non-compliance observed for any of the SEBI Regulation/circular/guidance note etc.,	Yes	None



**Note:**

The listed entity is in compliance with the conditions specified under paragraph 6.1 and 6.2 of Section V-D of chapter V of SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024. The terms of appointment of the Statutory Auditors have been modified in line with the said circular. Further, there were no instances of any resignation of Statutory Auditors during the period under review.

**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. My responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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.

**Place: Hyderabad**

**Date: 30.05.2025**

**N Vanitha**  
**Practicing Company Secretary**  
**ACS No.:26859**  
**C.P. No.:10573**  
**Peer Review Cert No.: 1890/2022**  
**UDIN: A026859G000515193**