AAKANKSHA DUBEY & CO.
PRACTICING COMPANY SECRETARY

SECRETARIAL COMPLIANCE REPORT OF OXYGENTA PHARMACEUTICAL LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2026

We, **M/s Aakanksha Dubey & Co**, Practicing Company Secretaries have examined:

(a) All the documents and records made available to us and explanation provided by **Oxygenta Pharmaceutical Limited** ("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 financial year ended **March 31, 2026** ("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 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;

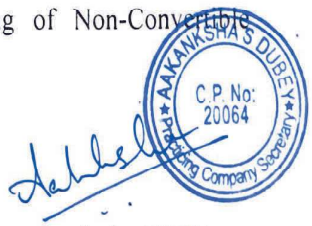
(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable**

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable**



Add: H. No. 11-1-439/301, 3rd Floor, Baba Residency, Sitaphalmandi, Secunderabad – 500061,
Ph. 9989234382, e-mail–aakanksha.shuklacs@gmail.com

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued there under

(h) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021: **Not Applicable during the Audit Period**

(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable;

(j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2025;

(k) SEBI Circular - **CIR/CFD/CMD1/114/2019** (Resignation of statutory auditors from listed entities and their material subsidiaries) – **Not Applicable during the Audit Period**

(l) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009 to the extent applicable;

(m) other regulations as applicable.

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 there under wherever applicable, 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 Practicing Company Secretary (PCS)*	*Management Response*	*Remarks*
NIL										

AAKANKSHA S DUBEY ★ C.P. No: 20064 ★ Practicing Company Secretary

Add: H. No. 11-1-439/301, 3rd Floor, Baba Residency, Sitaphalmandi, Secunderabad – 500061,
Ph. 9989234382, e-mail–aakanksha.shuklacs@gmail.com

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.....(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 as the previous Secretarial Compliance Report for Year ended 31.03.2025, did not contain any observations.						

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.	**Secretarial Standards:** 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	None
2.	**Adoption and timely updation of the Policies:** • 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	None
3.	**Maintenance and disclosures on Website:** • The listed entity is maintaining a functional website. • Timely dissemination of the documents/information under separate section on the website. • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to	Yes Yes Yes	None

Add: H. No. 11-1-439/301, 3rd Floor, Baba Residency, Sitaphalmandi, Secunderabad – 500061,
Ph. 9989234382, e-mail–aakanksha.shuklacs@gmail.com

	the relevant document(s)/section of the website.		
4.	**Disqualification of Director(s):** 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.	Yes	None
5.	**Details related to subsidiaries of listed entities have been examined w.r.t.:** (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	NA	None
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	None
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	None
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 NA	None
9.	**Disclosure of events or information:**		

AAKANKSHA S DUBEY C.P. No: 20064 Practicing Company Secretary

Add: H. No. 11-1-439/301, 3rd Floor, Baba Residency, Sitaphalmandi, Secunderabad – 500061,
Ph. 9989234382, e-mail–aakanksha.shuklacs@gmail.com

	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	None
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	None
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 (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Yes	None
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.	NA	There was no resignation of the statutory auditor during the period under review.
13.	Additional non-compliances, if any:	Yes	The Manufacturing License (No. 10/MD/AP/2013/B/G, valid up to 23.04.2028) was suspended for a period of seven days from the date of service of the order (i.e. 21.10.2025) passed by the Drugs Control

AAKANKSHA DUBEY ★ C.P No. 20064 ★ Practicing Company Secretary

Add: H. No. 11-1-439/301, 3rd Floor, Baba Residency, Sitaphalmandi, Secunderabad – 500061,
Ph. 9989234382, e-mail–aakanksha.shuklacs@gmail.com

			Administration (DCA) due to violations of certain provisions of the Drugs and Cosmetics Act, 1940 and Rules, 1945, as reported by the Drug Inspector.

We further, report that the listed entity is in compliance~~/ not in compliance~~ with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations.

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.

AAKANKSHA S DUBEY * Practicing Company Secretary * C.P. No: 20064

Place: Hyderabad
Date: 22.05.2026

Aakanksha Sachin Dubey
Practicing Company Secretary
M. No. 49041; C.P. No. 20064
UDIN: A049041H000439035
Peer Review Certificate No. 3363/2023

Add: H. No. 11-1-439/301, 3rd Floor, Baba Residency, Sitaphalmandi, Secunderabad – 500061,
Ph. 9989234382, e-mail–aakanksha.shuklacs@gmail.com