

CCL/SEC/2025-26/12

May 29, 2025

To,
National Stock Exchange of India Limited
Exchange Plaza,
Plot No. C/1, G Block,
Bandra - Kurla Complex, Bandra (East),
Mumbai - 400 051.
Symbol: - CENTRUM

To,
BSE Limited
Corporate Relations Department,
1st Floor, New Trading Ring,
P. J. Towers, Dalal Street,
Mumbai - 400 001.
Scrip Code: - 501150

Dear Sir/Madam,

Sub.: Annual Secretarial Compliance Report from Practising Company Secretary in terms of Regulation 24A of the SEBI (LODR) Regulations, 2015 for the Financial Year ended March 31, 2025

In compliance with the Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Listing Regulations"), read with the relevant circular(s) issued by SEBI/Stock Exchanges from time to time, please find enclosed the Annual Secretarial Compliance Report issued by Mr. Umesh P Maskeri, Practising Company Secretary (COP No. 12704, FCS No 4831), for the Financial Year ended March 31, 2025.

You are requested to take the above information on record.

Yours faithfully,
For Centrum Capital Limited

Balakrishna Kumar
Company Secretary & Compliance Officer
Membership No. A51901

Encl.: As above



Umesh Parameshwar Maskeri
Practicing Company Secretary

No 304, Geetanjali Heights, Plot No.77, Sector 27
Near Presentation Convent School, Nerul East, Navi Mumbai-400 706
Mobile: 09930178352; Email: umeshmaskeri@gmail.com

ANNUAL SECRETARIAL COMPLIANCE REPORT
Of Centrum Capital Limited
For the Financial Year ended March 31, 2025
Pursuant to the provisions of Regulation 24 (A)(2) of the
Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015
Read with SEBI Master Circular No SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024

To
The Members of
Centrum Capital Limited
Registered Office
Level -9, Centrum House, C.S.T. Road, Vidyanagari Marg
Kalina, Santacruz (East), Mumbai -400098

Dear Sir,

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Centrum Capital Limited (herein after referred to as the "listed entity" having Corporate Identification Number as L65990MH1977PLC019986 and having its Registered Office at Level -9, Centrum House, C.S.T. Road, Vidyanagari Marg, Kalina, Santacruz (East), Mumbai - 400098. Secretarial review 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 listed entity's books, papers, minutes books, forms and return filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorised representatives during the conduct of Secretarial Review, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on 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 o the reporting made hereinafter :

I, have examined:

- a) All the documents and records made available to me and explanation provided by Centrum Capital 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 certification, for the year Financial Year ended March 31, 2025 ("Review Period") in respect of compliance with the provisions of
:
 - a) Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
 - b) Securities Contract (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, Circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

Umesh Maskeri





Umesh Parameshwar Maskeri
Practising Company Secretary

The specified 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 Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; Not applicable to the Company during the review period
- (e) Securities and Exchange Board of India (Share Based Employees Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not applicable to the Company during the review period
- (g) Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021; Not applicable to the Company during the review period
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Merchant Bankers) Regulations, 2013
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (k) Securities and Exchange Board of India (Underwriters) Regulations, 1993;
- (l) Securities and Exchange Board of India (Intermediaries) Regulations, 2008
- m) Securities and Exchange Board of India (Certification of Associated Persons in the securities Markets) Regulations, 2007;

I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS
1	Secretarial standard : The compliances of listed entity are in accordance with the applicable Secretarial Standards issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 203 and mandatorily applicable	Yes	-
2	Adoption and timely updation of policies : <ul style="list-style-type: none">• All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entity• All the policies are in conformity with the SEBI Regulations and has been reviewed and timely updated as pr the regulations / circulars/ guidelines issued by SEBI	Yes	-
3	Maintenance and disclosures on website : <ul style="list-style-type: none">• The Listed entity is maintaining a functional website• Timely dissemination of the documents / information under a separate section on the website• Weblinks 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	Yes	-
4	Disqualification of Director : None of the Directors of the Company are disqualified under Section 164 of the Companies Act, 2013	Yes	-



Umesh P. Maskeri



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Practicing Company Secretary

4	None of the Directors of the Company are disqualified under Section 164 of the Companies Act, 2013		
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	Yes	-
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	-
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 as prescribed in SEBI Regulations	Yes	-
8	Related party Transactions : (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions	Yes	-
	(b) In case no prior approval obtained, the listed entity shall provide detailed reasons alongwith confirmation whether the transactions were subsequently approved / ratified / rejected by the Audit Committee	Not applicable	Not applicable
9	Disclosure of events or information : The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder	Yes	-
10	Prohibition of Insider Trading : The listed entity is in compliance with Regulation 3(5) and 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	-
11	Actions taken by SEBI or Stock Exchanges (s) if any : No Actions taken against the listed entity / its promoters / directors / subsidiaries either SEBI or by Stock Exchanges (including the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars / guidelines issued thereunder except as provided under separate Annexure I	Yes	-
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 No SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 on compliance with the provisions of the LODR Regulations by listed entities.	Not applicable	No such instance
13	Additional Non -compliances, if any : No any addition non-compliance observed for all SEBI regulations / circular / guidance note etc.	Not applicable	



Umesh P. Maskeri



Umesh Parameshwar Maskeri
Practicing Company Secretary

UMESH P. MASKERI
COMPANY SECRETARY
304, Geetanjali Heights,
Plot No. 77, Sector - 27,
Nerul (East)
Navi Mumbai - 400 706.

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 my examination of relevant documents and information This is neither an audit nor an expression of opinion.
3. I have not verified the correctness an 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 effectiveness with which the management has conducted the affairs of the listed entity.

Umesh Maskeri

Umesh Parameshwar Maskeri
Practicing Company Secretary
COP No. 12704 FCS No 4831
ICSI Peer Review Certificate No 6331/2024
ICSI UDIN F004831G000355797



Place: Mumbai
Date: May 16, 2025