

May 29, 2025

BSE Limited

Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (East), Mumbai - 400 051

Scrip Code: 544184**Symbol: BOROSCI**

Dear Sir(s),

**Sub: Annual Secretarial Compliance Report for the financial year ended
March 31, 2025**

In terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2025.

You are requested to take the same on records.

Thanking you,

Yours faithfully,

For **Borosil Scientific Limited**

Sanjay Gupta

Company Secretary & Compliance Officer

ICSI Membership No.: A24641

Encl: as above

Amogh Diwan & Associates

Company Secretaries in Practice

ICSI Unique Code - S2019MH668700

agd@amoghdivan.com / rns@amoghdivan.com

SECRETARIAL COMPLIANCE REPORT OF BOROSIL SCIENTIFIC LIMITED (For the Financial Year ended March 31, 2025)

To,
Borosil Scientific Limited
CIN: L74999MH1991PLC061851
1101, 11th Floor, Crescenzo,
G-Block, Plot No C-38 Opp. MCA Club,
Bandra Kurla Complex, Bandra, Mumbai,
Mumbai City, Maharashtra – 400051

I, Amogh Diwan have examined

- (a) all the documents and records made available to us and explanation provided by the Borosil Scientific Limited (the “**Company**”),
- (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 31/03/2025 (“**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 SEBI;

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- (a) Securities and Exchange Board of India (LODR) 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;~~
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat

Amogh Diwan & Associates

Company Secretaries in Practice

ICSI Unique Code - S2019MH668700

agd@amoghdiwan.com / rns@amoghdiwan.com

Equity) Regulations, 2021;

~~(f) Securities and Exchange Board of India (Issue and Listing of Non Convertible Securities) Regulations, 2021~~

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(h) other regulations as applicable and circulars/ guidelines issued thereunder;

and based on the above examination, I 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: **Not Applicable**

I 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)	Observation s/ 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	Nil
2.	Adoption and timely updation of the 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 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	Nil

Amogh Diwan & Associates

Company Secretaries in Practice

ICSI Unique Code - S2019MH668700

agd@amoghdiwan.com / rns@amoghdiwan.com

3.	<p>Maintenance and disclosures on Website:</p> <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.• 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	Nil
4.	<p>Disqualification of Director(s):</p> <p>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.</p>	Yes	Nil
5.	<p>Details related to subsidiaries of listed entities have been examined w.r.t.:</p> <p>a) Identification of material subsidiary companies.</p> <p>b) Disclosure requirement of material as well as other subsidiaries.</p>	Yes	Goel Scientific Glass Works Limited is a material subsidiary of the Company.
6.	<p>Preservation of Documents:</p> <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 SEBI LODR Regulations, 2015.</p>	Yes	Nil

Amogh Diwan & Associates

Company Secretaries in Practice

ICSI Unique Code - S2019MH668700

agd@amoghdiwan.com / rns@amoghdiwan.com

7.	<p>Performance Evaluation:</p> <p>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.</p>	Yes	Nil
8.	<p>Related Party Transactions:</p> <p>a) The listed entity has obtained prior approval of audit committee for all related party transactions;</p> <p>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.</p>	Yes NA	Nil No such instances observed
9.	<p>Disclosure of events or information:</p> <p>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.</p>	Yes	Nil
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	Nil
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>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</p>	NA	No action taken

Amogh Diwan & Associates

Company Secretaries in Practice

ICSI Unique Code - S2019MH668700

agd@amoghdiwan.com / rns@amoghdiwan.com

	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.		
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	No resignation of statutory auditor happened during the Review Period.
13.	Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	NA	Nil

We further, report that the listed entity is 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.

Amogh Diwan & Associates

Company Secretaries in Practice

ICSI Unique Code - S2019MH668700

agd@amoghdewan.com / rns@amoghdewan.com

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.

For Amogh Diwan & Associates

**Amogh
Gautam
Diwan**

Digitally signed by
Amogh Gautam
Diwan
Date: 2025.05.27
19:25:25 +05'30'

CS Amogh Diwan

ACS 53700

CoP 21829

Date – 27/05/2025

Place -Navi Mumbai

UDIN: A053700G000452923

Peer Review No. 4576/2023

Firm Registration: S2019MH668700