



DATE: 28/05/2025

To,
The Deputy Manager,
Department of Corporate Services,
National Stock Exchange India Limited
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex, Bandra (E),
Mumbai, Maharashtra 400051.

REF: SCRIP CODE: CROWN SERIES: EQ ISIN: INE491V01019

SUB: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR FINANCIAL YEAR 2024-2025

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 8, 2019; please find enclosed the Annual Secretarial Compliance Report of the company for the financial year ended March 31, 2025 issued by Mr. Ronak D. Doshi, Practicing Company Secretary, for the financial year 2024-2025.

This is for your information and record.

FOR, CROWN LIFTERS LIMITED

POOJA B. SHIRKE
ACS: 74805
COMPANY SECRETARY & COMPLIANCE OFFICER



ANNUAL SECRETARIAL COMPLIANCE REPORT OF
CROWN LIFTERS LIMITED
(CIN: L74210MH2002PLC138439)
FOR THE YEAR ENDED 31ST MARCH, 2025

We, Ronak Doshi & Associates, Company Secretary in Practice have examined:

- All the documents and records made available to us and explanation provided by **CROWN LIFTERS LIMITED** ("the listed entity"),
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended on 31st March, 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, including:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; as amended from time to time
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; as amended from time to time.
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; as amended from time to time
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (**Not applicable during the review period**)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2021;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**Not applicable during the review period**)
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (**Not applicable during the review period**)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Delisting of Equity Shares) (Amendment) Regulations, 2021; (**Not applicable during the review period**)



- j) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009; **(Not applicable during the review period)**
- k) Securities and Exchange Board of India (Depository Participant) Regulations, 2018; and circulars/ guidelines issued thereunder;

We hereby report that, during the review period the compliance status of the listed entity is appended below;

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 India (ICSI)	Yes	
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 has been reviewed & timely updated as per the regulations/circulars/ guidelines issued by SEBI	Yes	
3.	Maintenance and disclosures on Website: 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 re-directs to the relevant document(s)/ section of the website.	Yes	
4.	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	
5.	To examine details related to Subsidiaries of listed entities: (a) Identification of material	NA	The entity has no subsidiary company.



	subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries		
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 (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	Yes	
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) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action has been taken against	YES	



	the listed entity/ its promoters/ directors/ subsidiaries by SEBI.		
12.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.	NA	There is No additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.

* Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

(a) The listed entity has **mostly** complied with the provisions of the above regulations and circulars/ guidelines issued thereunder, **except** in respect of matters as specified below:

SR No.	Compliance Requirements (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of violation	Fine Amount	Observations/ Remarks of Practicing Company Secretary	Management Response	Remarks
NOT APPLICABLE										

(b) The listed entity has taken the following actions to comply with the observations made in previous reports: There was no observation made in previous report.

Matters of Emphasis:

Matters of Emphasis

On February 10, 2025, the Company received a query from the National Stock Exchange (NSE) regarding its Corporate Governance Report for the quarter ended December 31, 2024. The concerns raised and the Company's responses are summarized below:

- 1. Composition of Board (Regulation 17 of SEBI LODR Regulations, 2015):** The Company has sought clarification on the applicability of the requirement to have a minimum of six directors on the Board, as mandated for the top 2000 listed entities. The management of the Company believed that it is not within the top 2000 listed entities based on its interpretation of trading status and market capitalization. However, the company has appointed Mr. Nooruddin Rajwani as an Additional Director w.e.f. 14/02/2025 to maintain 6 Directors in the board and complied with Regulation 17 of SEBI LODR Regulations, 2015.
- 2. Composition of Stakeholders Relationship Committee Composition (Regulation 20 of SEBI LODR Regulations, 2015):**
A vacancy in the Stakeholders Relationship Committee arose on November 9, 2024, reducing its composition below the required minimum of three members. The Company filled this vacancy on December 30, 2024 and complied with Reg. 20 of SEBI LODR Regulations, 2015.



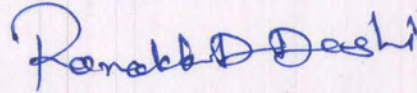
3. Discrepancy in Audit Committee Meeting Attendance

In the Audit Committee meeting held on October 21, 2024, the Company reported that three Independent Directors attended the meeting; however, the count of Total Number of Independent Directors in the Committee as on the date of the meeting were two. This discrepancy was due to an inadvertent typographical error and which was rectified by the company.

Thus, The Company has addressed all the concerns raised and has taken corrective actions and provided clarifications to ensure compliance with the applicable provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

PLACE: AHMEDABAD
DATE: 07/05/2025
UDIN: A023712G000291771

FOR, RONAK DOSHI & ASSOCIATES
PRACTICING COMPANY SECRETARY



RONAK D. DOSHI
PROPRIETOR
ACS NO.: 23712
C.P. NO.: 12725
PRC: 1698/2022

