



**SHIVA**

A SUBSIDIARY OF  
**JSW Cement**

**Date: 26<sup>th</sup> May 2026**

To,  
**BSE Limited,**  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai - 400 001  
Scrip Code – 532323

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report for the year ended 31.03.2026**

Dear Sir/Madam,

Pursuance to Regulation 24A(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time, please find enclosed herewith Annual Secretarial Compliance Report dated 26<sup>th</sup> May, 2026, for the Year ended on 31.03.2026, issued by M/s. SR Agrawal & Associates., Company Secretaries, for your information and record.

You are kindly requested to take note of the above.

Thanking You,

**For Shiva Cement Limited**

**Ishika Sharma**  
**Company Secretary & Compliance Officer**  
**ACS: A70573**

Encl: As above

**SHIVA CEMENT LIMITED**

CIN L26942MH1985PLC470630

Registered Office address- Jindal Mansion, 5A, DR. G, Deshmukh Marg, Mumbai, 400026, Maharashtra  
E-mail-id: cs@shivacement.com | Phone (Off.): +91-2242861000 | Website: www.shivacement.com



# SR AGARWAL & ASSOCIATES

COMPANY SECRETARIES

Office No. 116, 1st Floor, Ostwal Ornate Bldg No. 2, Opp. Jain Mandir,  
Jesal Park, Bhayander East 401105

EMAIL: [sragarwalassociate@gmail.com](mailto:sragarwalassociate@gmail.com)

## Secretarial Compliance Report of SHIVA CEMENT LIMITED for the year ended 31<sup>st</sup> March, 2026

We, M/s. SR Agarwal & Associates, Practicing Company Secretary have examined:

- a) all the documents and records made available to us and explanation provided by Shiva Cement Limited ("Listed Entity/the Company"),
- b) the filings/ submissions made by the Company to the stock exchanges,
- c) website of the Company,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the financial year ended 31<sup>st</sup> March, 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 Securities and Exchange Board of India ("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 ("LODR Regulations");
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; *(Not Applicable to the Company during the review period)*
- 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 Employee Benefits and Sweat Equity) Regulations, 2021; *(Not Applicable to the Company during the review period)*
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities)





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Regulations, 2021; (Not Applicable to the Company during the review period)

- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
  - h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
  - i) other regulations as applicable and circulars/ guidelines issued thereunder;
- (a) The Company 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 Practicing Company Secretary	Management Response	Remarks
NIL										

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

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	Management Response	Remarks
-NOT APPLICABLE-										

- (c) We hereby report that, during the review period the compliance status of the Company is appended below;





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Sr. No	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<b>Secretarial Standards:</b> The compliances of the Company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	-
2.	<b>Adoption and timely updation of the Policies:</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 Company,</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	-
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>The Company is maintaining a functional website</li><li>Timely dissemination of the documents/ information under a separate 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 Yes Yes	-
4.	<b>Disqualification of Director:</b> None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013.	None	-
5.	<b>Details related to Subsidiaries of listed entities:</b> <ul style="list-style-type: none"><li>Identification of material subsidiary companies.</li><li>Requirement with respect to disclosure of material as well as other subsidiaries.</li></ul>	NA NA	-
6.	<b>Preservation of Documents:</b> The Company 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.	Yes	-
7.	<b>Performance Evaluation:</b> The Company has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as	Yes	-





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

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. -Not Applicable.

Assumptions & limitation of scope and review:





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1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the Company.
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 Company.
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 Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.



Place: MUMBAI  
Date: 26/05/2026

For SR AGARWAL & ASSOCIATES.  
Company Secretaries

SUNIL AGARWAL  
(Partner)

FRNO. P2021MH087900

FCS No. 8706

C.P. No. 3286

UDIN: F008706H000484601

Firm Peer Review No.7122/2025