



12th September, 2025

To
The Secretary
BSE Limited
P J Towers, Dalal Street,
Mumbai – 400 001.

Scrip Name: PANCM

Scrip Code: 500322

Dear Sir/Madam,

Subject: Secretarial Compliance Report for the year ended 31st March, 2025.

Ref.: Regulation 24(A) of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

With reference to the subject mentioned above, please find the enclosed Secretarial Compliance Report of the Company for the financial year ended 31st March, 2025.

We request you to kindly take the report on record.

Thanking you.

Yours Sincerely

For **PANYAM CEMENTS & MINERAL INDUSTRIES LIMITED**

JAGATHRAKSHA
KAN SRINISHA

Digitally signed by
JAGATHRAKSHAKAN SRINISHA
Date: 2025.09.12 13:42:02 +05'30'

JAGATHRAKSHAKAN SRINISHA
MANAGING DIRECTOR
DIN-01728749

Encl.: As mentioned above.

Panyam Cements and Mineral Industries Limited

Registered Office & Works: 10/156, Betamcherla Road, Cement Nagar, Nandyal Dist., Andhra Pradesh – 518206.
Corporate Office: H. No. 1-65, 1st Floor, Road No.11, Kakateeya Hills, Madhapur, Hyderabad-500081. Phone: 040-49544944
CIN: L26940AP1955PLC000546; GST: 37AABCP2298M2ZV Web: www.panyamcements.in
Phone (Admin) 08516 – 293622 (Commercial) 08516 – 293625 Email: pcmilcao@panyamcements.in



B S S & ASSOCIATES

COMPANY SECRETARIES

Flat No. 5A, Parameswara Apartments, Beside SBI, Anandnagar, Khairatabad, Hyderabad-500 004

Phone : 040 - 40171671, Cell : 6309490217

E-mail : cs@bssandassociates.com

Secretarial Compliance Report of **PANYAM CEMENTS AND MINERAL INDUSTRIES LIMITED** for the year ended March 31, 2025

To,

The Members

PANYAM CEMENTS AND MINERAL INDUSTRIES LIMITED

10/156, Betamcherla Road, Betamcherla,

Cement Nagar, Kurnool, Andhra Pradesh 518206

We, B S S & Associates, Company Secretaries, have examined:

- all the documents and records made available to us and explanation provided by PANYAM CEMENTS AND MINERAL INDUSTRIES LIMITED [CIN:L26940AP1955PLC000546] ("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 financial year ended March 31, 2025 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - Not applicable during the Review Period;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - Not applicable during the Review Period;
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - Not applicable during the Review Period;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - Not applicable during the Review Period;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- other regulations as applicable.

and circulars / guidelines issued thereunder;



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 thereunder, except in respect of matters specified below: -

Sl. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Regulation / Circular No.	Deviations	Action taken by	Type of Action Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Minimum Public Shareholding Requirement	Rule 19A of the Securities Contracts (Regulation) Rules, 1957	The public shareholding of the company fell below 25% as a result of implementation of the resolution plan approved under section 31 of the Insolvency and Bankruptcy Code, 2016 and the Company has not increased its public shareholding in the manner specified in Rule 19A(5) of the Securities Contracts (Regulation) Rules, 1957.	-	-	The Company did not increase its public shareholding to at least 10% within 12 months, as required under Rule 19A(5), after the fall resulting from implementation of a resolution plan under the Insolvency and Bankruptcy Code, 2016.	-	The public shareholding fell to 5% pursuant to the resolution plan approved under Section 31 of the Insolvency and Bankruptcy Code, 2016. The Company did not comply with the requirement to increase public shareholding to 10% within 12 months, as mandated under Rule 19A(5). The public shareholding is now required to be increased to 25% by 2nd February, 2026	The Company is actively pursuing options and engaging in discussions to increase public shareholding to meet the statutory requirement.	-



(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	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
1	The Company has submitted the annual audited financial results for the financial year March 31, 2023 on 27.05.2023. However, revised financial results submitted on 04.09.2023	The Company has submitted the annual audited financial results for the financial year March 31, 2023 on 27.05.2023. However, revised financial results submitted on 04.09.2023	The listed entity shall submit annual audited standalone financial results for the financial year, within sixty days from the end of the financial year along with the audit report. Regulation 33(3)(d) of SEBI (LODR) Regulations, 2015	Revised financial results were submitted on 04.09.2023. However, financial results, at first, were submitted on 27.05.2023.	Nil, as delay occurred during CIRP.	Company has taken note and assured timely compliance.
2	The company has submitted the financial results on 04.09.2023 with delay of 21 days.	The company has submitted the financial results on 04.09.2023 with delay of 21 days	The listed entity shall submit quarterly and year-to-date financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter. Regulation 33(3)(a) of SEBI (LODR) Regulations, 2015	Delay of 21 days in submission of the financial results for the quarter ended June 30, 2023.	Nil, as delay occurred during CIRP.	Company has assured compliance going forward.
3	The public shareholding of the company has fallen below 25% due to Corporate Insolvency Resolution Process (CIRP). As per the NCLT Order, the company needs to increase its public shareholding by 5%, aggregating up to 10% within the next 12 months.	The public shareholding of the company has fallen below 25% due to Corporate Insolvency Resolution Process (CIRP). As per the NCLT Order, the company needs to increase its public shareholding by 5%, aggregating up to 10% within the next 12 months.	The Public shareholding of the Company is 5.00% against require public shareholding of 25% Rule 19A of the Securities Contracts (Regulation) Rules, 1957	The Company did not increase its public shareholding to at least 10% within a maximum period of 12 months from the date of such fall.	Company is exploring options. Advised to expedite steps to meet MPS norms.	Company is exploring options. Advised to expedite steps to meet MPS norms.
4	The promoter of every target company shall declare on a yearly basis that he, along with persons acting in concert, has not made any encumbrance, directly or indirectly, other than those already disclosed during the financial year to (a) every stock exchange where the shares of the target company are listed; and (b) the audit committee of the target company.	Public shareholding fell below 25% due to CIRP. As per NCLT order, the company must increase public shareholding by 5%, aggregating to 10%, within 12 months.	Promoters failed to make the required declarations for the financial year ended March 31, 2023.	Non-submission of declarations by promoters for FY 2022-23.	Company has taken note and assured strict compliance in future.	Promoters were informed by the company about the compliance requirement.



We 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 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), as notified by the Central Government under section 118(10) of the Companies Act, 2013, and mandatorily applicable.	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
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 • 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	Nil
4.	Disqualification of Director: None of the Director(s) of the Company is / are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Nil
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	Nil
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	Nil
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	Nil
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	Nil
9.	Disclosure of events or information: 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	Nil
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	Nil



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 except as provided under separate paragraph herein.	Yes	Nil
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	Not Applicable during the period under review.
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	No additional non-compliance observed for all SEBI regulation / circular / guidance note etc.

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 – NA.

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 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 efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For B S S & Associates
Company Secretaries



S. Srikanth

S. Srikanth
Partner

ACS No.: 22119; C.P. No.: 7999
UDIN: A022119G000486627
Peer Review No.6513/2025

Place: Hyderabad
Date: 29.05.2025