



27<sup>th</sup> May, 2026

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 31<sup>st</sup> March, 2026.

**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 31<sup>st</sup> March, 2026.

We request you to kindly take the report on record.

Thanking you.

Yours Sincerely

For **PANYAM CEMENTS & MINERAL INDUSTRIES LIMITED**

**J SRINISHA**

Digitally signed by J SRINISHA  
Date: 2026.05.27 16:08:28  
+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, 1<sup>st</sup> Floor, Road No.11, Kakateeya Hills, Madhapur, Hyderabad-500081. Phone: 040-49544944  
CIN: L26940AP1955PLC000546; GST: 37AABCP2298M2ZV Web: [www.panyamcements.in](http://www.panyamcements.in)  
Phone (Admin) 08516 – 293622 (Commercial) 08516 – 293625 Email: [pcmilcao@panyamcements.in](mailto: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, 2026

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:

- (a) all the documents and records made available to us and explanation provided by PANYAM CEMENTS AND MINERAL INDUSTRIES LIMITED [CIN: L26940AP1955PLC000546] ("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 financial year ended March 31, 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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - Not applicable 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 during the Review Period;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - Not applicable during the Review Period;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - Not applicable during the Review Period;
- (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, 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	Submission of the financial results for the quarter ended March 31, 2025	Regulation 33 of SEBI (LODR) Regulations, 2015	Non-submission	BSE Limited	Fine BSE Email Date: July 14, 2025	Non-submission of financial results for the quarter ended 31st March, 2025 within the stipulated time	Rs. 2,53,700/- Till July 14, 2025	The Company did not submit the financial results for the quarter ended 31st March, 2025 within the prescribed timeline	Financial results were subsequently filed on 06.10.2025. However, the Company has paid a fine of Rs.2,53,700 on 28.03.2026.	-
2	Submission of the financial results for the quarter ended 30 <sup>th</sup> June, 2025	Regulation 33 of SEBI (LODR) Regulations, 2015	Non-submission	BSE Limited	Fine BSE Email Date: October 1, 2025	Non-submission of financial results for the quarter ended 30 <sup>th</sup> June, 2025 within the stipulated time	Rs. 2,65,500/- Till October 1, 2025	The Company did not submit the financial results for the quarter ended 30 <sup>th</sup> June, 2025 within the prescribed timeline	Financial results were subsequently filed on 27.12.2025. However, the Company has paid a fine of Rs.2,65,500 on 28.03.2026.	-
3	Submission of the financial results for the quarter ended 30 <sup>th</sup> September, 2025	Regulation 33 of SEBI (LODR) Regulations, 2015	Non-submission	BSE Limited	Fine BSE Email Date: January 1, 2026	Non-submission of financial results for the quarter ended 30 <sup>th</sup> September, 2025 within the stipulated time	Rs.2,71,400 /- Till January 1, 2026	The Company did not submit the financial results for the quarter ended 30 <sup>th</sup> September, 2025 within the prescribed timeline	Financial results were subsequently filed on 14.03.2026. However, the Company has paid a fine of Rs.2,71,400 on 13.01.2026	-



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4	Submission of the financial results for the quarter ended 31 <sup>st</sup> December, 2025	Regulation 33 of SEBI (LODR) Regulations, 2015	Non-submission	BSE Limited	Fine BSE Email Date: March 17, 2026 and April 02, 2026	Non-submission of financial results for the quarter ended 31 <sup>st</sup> December, 2025 within the stipulated time	Rs. 1,71,100 up to March 17, 2026 and Rs. 94,400 up to April 2, 2026.	The Company did not submit the financial results for the quarter ended 31 <sup>st</sup> December, 2025 within the prescribed timeline under Regulation 33 of SEBI (LODR) Regulations, 2015.	Financial results were subsequently filed on 28.04.2026. However, the Company has paid a fine of Rs. 1,71,100 on 28.03.2026 and Rs.94,400/- on 09.04.2026	
5	Minimum Public Shareholding requirement was not complied with, as the public shareholding of the Company fell below the prescribed threshold of 25% pursuant to the implementation of the Resolution Plan approved under Section 31 of the Insolvency and Bankruptcy Code, 2016.	Regulation 38 of SEBI (LODR) Regulations, 2015	the Company did not increase its public shareholding in the manner and within the timeline prescribed under Rule 19A(5) of the Securities Contracts (Regulation) Rules, 1957.	BSE Limited	Fine	The Company did not achieve the prescribed 25% public shareholding within the stipulated period as required under Rule 19A(5) of the Securities Contracts (Regulation) Rules, 1957.	Rs. 21,59,400/- (for the quarters April-June 2025 and July-September 2025).  Rs. 10,85,600 October to December 2025.	The public shareholding of the Company fell below the prescribed 25% threshold pursuant to the approved Resolution Plan, and the Company was required to restore the minimum public shareholding on or before February 2, 2026. However, the Company has not yet achieved the prescribed requirement	The Company has informed that it is evaluating and pursuing available options to increase the public shareholding and comply with the minimum public shareholding requirements and also has also paid the fine levied by BSE Limited amounting to Rs.21,59,400/- on 25.11.2025. And Rs.10,85,600/- on 25.11.2025.	The matter remains open and is subject to future compliance with the minimum public shareholding requirements within the prescribed timeline.



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6	Requirement to appoint a qualified Company Secretary as Compliance Officer	Regulation 6(1) of SEBI (LODR) Regulations, 2015	Non-compliance with the requirement to appoint a qualified Company Secretary as Compliance Officer within the prescribed timeline	BSE Limited	Fine	The Company did not have a qualified Company Secretary appointed as Compliance Officer in compliance with Regulation 6(1) of SEBI (LODR) Regulations, 2015.	Rs. 1,26,260/-	The Company was not in compliance with Regulation 6(1) of SEBI (LODR) Regulations, 2015 relating to the appointment of a qualified Company Secretary as Compliance Officer.	The Company appointed a Company Secretary and Compliance Officer on 30.10.2026. Further, the Company has paid the fine of Rs.92,040/- on 13.01.2026 and Rs.34,220/- on 28.03.2026	-
7	Submission of investor complaints for the quarter ended 30 <sup>th</sup> June, 2025	Regulation 13(3) of SEBI (LODR) Regulations, 2015	Delay in submission of the statement of investor complaints within the prescribed timeline	BSE Limited	Fine	The Company did not submit the statement of investor complaints within the timeline prescribed	Rs. 47,200/-	The Company delayed submission of the statement on investor complaints required under Regulation 13(3) of SEBI (LODR) Regulations, 2015.	The Company subsequently submitted the statement on investor complaints on 03.11.2025. Further, the Company has paid the fine of Rs.47,200/- levied by BSE Limited on 28.03.2026.	-



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8	Submission of statement on investor complaints for the quarter ended 30 <sup>th</sup> September, 2025	Regulation 13(3) of SEBI (LODR) Regulations, 2015	Delay in submission of the statement of investor complaints within the prescribed timeline	BSE Limited	Fine	The Company did not submit the statement of investor complaints within the timeline prescribed	Rs.7,080/-	The Company delayed submission of the statement on investor complaints required under Regulation 13(3) of SEBI (LODR) Regulations, 2015.	The Company subsequently submitted the statement on investor complaints on 05.11.2025. Further, the Company has paid the fine of Rs.7,080/- levied by BSE Limited on 13.01.2026.	-
9	Submission of Annual Secretarial Compliance Report within the prescribed timeline	Regulation 24A of SEBI (LODR) Regulations, 2015	Non-submission of the Annual Secretarial Compliance Report within the prescribed timeline	BSE Limited	Fine	The Company did not submit the Annual Secretarial Compliance Report within the timeline prescribed	Rs. 1,01,480/-	The Company was not in compliance with Regulation 24A of SEBI (LODR) Regulations, 2015 relating to timely submission of the Annual Secretarial Compliance Report.	The Company subsequently submitted the Annual Secretarial Compliance Report on 12.09.2025. Further, the Company has paid the fine of Rs.1,01,480/- levied by BSE Limited on 28.03.2026	-



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
10	Submission of Corporate Governance Report for the quarter ended June 2025 within the prescribed timeline	Regulation 27(2) of SEBI (LODR) Regulations, 2015	Delay in submission of Corporate Governance Report	BSE Limited	Fine	The Company did not submit the Corporate Governance Report for the quarter ended June 2025 within the prescribed timeline.	Rs. 1,10,920/-	The Company was not in compliance with Regulation 27(2) of SEBI (LODR) Reg, 2015 relating to timely submission of the Corporate Governance Report. However, the Company subsequently submitted the report and paid the fine levied by BSE Limited.	The Company submitted the Corporate Governance Report on 03.11.2025 and paid the applicable fine on 28.03.2026	-
11	Submission of Corporate Governance Report for the quarter ended September 2025 within the prescribed timeline	Regulation 27(2) of SEBI (LODR) Regulations, 2015	Delay in submission of Corporate Governance Report	BSE Limited	Fine	The Company did not submit the Corporate Governance Report for the quarter ended September 2025 within the prescribed timeline.	Rs. 14,160/-	The Company did not comply with Regulation 27(2) of SEBI (LODR) Reg, 2015 for timely submission of the Corporate Governance Report. The report was subsequently filed on 05.11.2025 and the applicable fine was paid.	The Company submitted the Corporate Governance Report on 05.11.2025 and paid the applicable fine on 13.01.2026.	-



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
12	Submission of prior intimation of Board Meeting in the month of October, 2025	Regulation 29(2) / 29(3) of SEBI (LODR) Regulations, 2015	Delay in submission of prior intimation of Board Meeting	BSE Limited	Fine	Prior intimation of Board Meeting for the month of October 2025 was not furnished within the prescribed timeline	Rs. 11,800/-	The Company was not in compliance with Regulation 29(2) / 29(3) of SEBI (LODR) Regulations, 2015 relating to prior intimation of Board Meeting. The Company has subsequently complied and paid the fine levied by BSE Limited.	The Company has furnished the prior intimation on 04.10.2025 for the Board Meeting held on 06.10.2025 and paid the fine of Rs.11,800/- on 28.03.2026 levied by BSE Limited.	-
13	Submission of prior intimation of Board Meeting in the month of December, 2025	Regulation 29(2) / 29(3) of SEBI (LODR) Regulations, 2015	Delay in submission of prior intimation of Board Meeting	BSE Limited	Fine	Prior intimation of Board Meeting for the month of December 2025 was not furnished within the prescribed timeline	Rs. 11,800/-	The Company was not in compliance with Regulation 29(2) / 29(3) of SEBI (LODR) Regulations, 2015 relating to prior intimation of Board Meeting. The Company has subsequently complied and paid the fine levied by BSE Limited.	The Company has furnished the prior intimation 26.12.2025 for the Board Meeting held on 28.12.2025 and paid the fine of Rs.11,800/- on 13.01.2026 levied by BSE Limited.	-



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
14	Submission of Shareholding Pattern for the quarter ended 30th June 2025	Regulation 31 of SEBI (LODR) Regulations, 2015	Non-submission of Shareholding Pattern within the prescribed timeline	BSE Limited	Fine	The Company did not submit the Shareholding Pattern for the quarter ended 30th June 2025 within the prescribed timeline under Regulation 31 of SEBI (LODR) Reg, 2015	Rs. 99,120/-	The Company was not in compliance with Regulation 31 of SEBI (LODR) Regulations, 2015 relating to timely submission of Shareholding Pattern.	The Company submitted the Shareholding Pattern on 09.09.2025 and paid the fine of Rs.99,120/- on 28.03.2026 levied by BSE Limited.	-
15	The listed entity is required to intimate the trading window closure to Stock Exchange PIT (Regulations) 2015.	Schedule B (4)(2) of SEBI (PIT) Regulations, 2015	Non intimation of Closure of trading window	-	-	Non intimation of Closure of trading window	-	The company has not intimated the trading window closure to the stock exchange	The Company has taken note of the non-compliance and assured strict adherence to the applicable provisions in future.	-
16	Submission of initial disclosure confirming that the Company is not a Large Corporate within 30 days from the beginning of the financial year	SEBI Circular SEBI/HO/D DHS/CIR/P/ 2018/144 dated November 26, 2018 and subsequent amendments	Non-submission of disclosure regarding non-applicability of the Large Corporate framework within time.	-	-	The Company did not submit the declaration confirming that it is not a Large Corporate within 30 days from the commencement of the financial year.	-	The Company, though not falling under the Large Corporate category, was required to submit the declaration of non-applicability within the prescribed timeline.	The management stated that the non-filing was due to an inadvertent oversight and has strengthened its compliance monitoring mechanism to avoid recurrence.	-



(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	Public shareholding had fallen to 5% pursuant to the resolution plan approved under Section 31 of the Insolvency and Bankruptcy Code, 2016, and required to be increased to minimum prescribed levels.	The public shareholding of the Company was reduced to 5% pursuant to the implementation of the Resolution Plan approved under Section 31 of the Insolvency and Bankruptcy Code, 2016. Accordingly, the Company is required to restore the minimum public shareholding of 25% on or before February 2, 2026. However, the Company has not yet achieved the prescribed minimum public shareholding requirement.	Regulation 38 of SEBI (LODR) Regulations, 2015 and Rule 19A (5) of the Securities Contracts (Regulation) Rules, 1957 (Minimum Public Shareholding requirement)	The Company failed to increase its public shareholding to at least 10% within the prescribed timeline following reduction in public shareholding pursuant to implementation of the resolution plan approved under the Insolvency and Bankruptcy Code, 2016. BSE Limited levied fines for such non-compliance, which have been paid by the Company.	The Company has informed that it is evaluating and pursuing available options to increase public shareholding and comply with the minimum public shareholding requirements within the prescribed timeline.	Though the Company has paid the fines levied by BSE Limited, compliance with the minimum public shareholding requirement is yet to be achieved. The matter continues to be under monitoring and follow-up.



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.	<b>Secretarial Standards:</b> 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.	<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 listed entities</li> <li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	Nil
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"> <li>• The Listed entity 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	Nil
4.	<b>Disqualification of Director:</b> 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.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t:</b> a) Identification of material subsidiary companies b) Disclosure requirement of material as well as other subsidiaries	Yes	Nil
6.	<b>Preservation of Documents:</b> 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.	<b>Performance Evaluation:</b> 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.	<b>Related Party Transactions:</b> 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  NA	Nil  Nil
9.	<b>Disclosure of events or information:</b> 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.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	Nil



11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> 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.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b> 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.	<b>Additional Non-compliances, if any:</b> 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



ACS No.: 22119; C.P. No.: 7999  
UDIN: A022119H000501807  
Peer Review No.6513/2025

Place: Hyderabad  
Date: 27.05.2026