



Expo Gas Containers Limited

Expo House, 150 Sheriff Devji Street,

Mumbai – 400 003, India

Tel.: +91 22 6131 9600 /Fax: +91 22 2340 1635

Website: www.expogas.com

CIN NO: L40200MH1982PLC027837

Ref: C:/ Expo/Bse/2025-26

May 19th, 2025

To,

Bombay Stock Exchange

Department of Corporate Services,

P.J. Towers, Dalal Street,

Mumbai – 400 001

Scrip Code: 526614

Dear Sir/ Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2025 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

In terms of the Regulation 24A of Securities and Exchange Board of India (Listing obligations and Disclosure Requirement) Regulations, 2015 read with the applicable Circulars issued by the Securities and Exchange Board of India, we are enclosing herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2025, issued by M/s. ND & Associates, Practicing Company Secretaries.

Thanking you

Yours faithfully,

For Expo Gas Containers Limited

Preeti Sharma
Company Secretary &
Compliance Officer



Neeta H. Desai

BA, LLB, LLM, FCS

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Secretarial Compliance Report

(Under regulation 24A of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015)

To,

Expo Gas Containers Limited

Expo House, 150 Sheriff Devji Street

Mumbai - 400 003

I, Neeta Desai, Practising Company Secretary have examined:

1. all the documents and records made available to me and explanation provided by **Expo Gas Containers Limited** ("the listed entity"),
2. the filings/ submissions made by the listed entity to the stock exchanges,
3. website of the listed entity,
4. any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 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, include:-

- (i) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (ii) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (iii) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (iv) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not applicable during the year under review.**
- (v) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not applicable during the year under review.**
- (vi) Securities and Exchange Board of India (Issue and Listing of Non Convertible Securities) Regulations, 2021; **Not applicable during the year under review.**
- (vii) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (viii) Securities and Exchange Board of India (Depositories and Participant Regulation), 2018;

- (ix) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 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, 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 (Advisory, Clarification, Fine, SCN, Warning Etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management response	Remarks
1	SOP for Regulation 6(1) of SEBI LODR	Regulation 6(1) of SEBI LODR	Appointment of Qualified Company Secretary for the quarter ended December 2018.	BSE	Fine Imposed	Qualified Company Secretary not appointed by the Company	Rs. 92000/-	Qualified Company Secretary not appointed by the Company.	The Company was in process to find a suitable candidate as a Company Secretary.	N. A.
2	SOP for Regulation 29(2) & 29(3) of SEBI LODR	Regulation 29(2) & 29(3) of SEBI LODR	Delay in furnishing prior intimation about the meeting of the board of directors held on August 28, 2020	BSE	Fine Imposed	Delay in furnishing prior intimation about the meeting of the board of directors	Rs. 10000/-	Delay in furnishing prior intimation about the meeting of the board of directors.	Delay due to symptomatic COVID -19 developed by office staff the office had to be closed and sanitization work had to be carried out.	N. A.

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

Sr. No	Observations / Remarks of the PCS in the previous report	Observations made in the SCR for the year ended 31.03.2024	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Details of Violation, deviation and action taken / penalty imposed, if any, on the listed entity	Remedial Action, if any, taken by the listed entity	Comments of PCS for the action taken by the listed entity
	Not Applicable as the provision became applicable to the Company from the FY 2024-2025					

(c) I hereby report that, during the review period the Compliance status of the listed entity with the following requirement:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations / Remarks by PCS
1	Secretarial Standards The Compliances of the listed entities are in accordance with the applicable Secretarial Standards (SS) issued by 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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI. 	Yes	All Policies are updated and are in conformity with SEBI Regulations.
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	The Website is functional and there is timely dissemination on the website.
4	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	NIL
5	Details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries.	N. A.	NIL

6	<p>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.</p>	Yes	NIL
7	<p>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.</p>	Yes	NIL
8	<p>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.</p>	Yes	NIL
9	<p>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 within the time limits prescribed thereunder.</p>	Yes	NIL
10	<p>Prohibition of Insider Trading: 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: No actions 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 (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	NA	<p>The Company was levied SOP fines by Mumbai Stock Exchange as stated above in point no. 4 (xi) (b) table and the company has paid the said SOP fines. Except these there are no actions taken against the listed entity/ its promoters/ directors either by SEBI or BSE and circulars/ guidelines issued there under.</p>

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.	N. A.	NIL
13	No additional non-compliances observed: No additional non-compliance observed for any of the SEBI regulation/ circular /guidance note etc. except as reported above.	NA	No Non-Compliance.

Assumptions & limitation of scope and review:

- (i) Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
- (ii) Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- (iii) We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
- (iv) 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.

Place: Mumbai

Date : 19.05.2025

UDIN : F003262G000376173

For ND & Associates
(Peer Reviewed)

NEETA
HARKISAN
DESAI



Neeta H. Desai
Practising Company Secretary
COP No. 4741