

Date: 07.05.2025

To, The Manager Listing Department BSE Limited Phiroze Jeejeebhoy Towers Dalal Street Mumbai- 400001 Scrip Code: 543945	To, The Manager Listing Department National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex Bandra East, Mumbai- 400051 Scrip Code: NETWEB
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**SUBJECT: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2025 under Regulation 24A of SEBI (LODR) Regulations, 2015.**

Pursuant to Regulation 24A (2) of SEBI (LODR) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report issued by M/s P.C Jain & Co. (FRN-P2016HR051300) for the year ended 31st March, 2025.

**Thanking You**

**For Netweb Technologies India Limited**

**Lohit**  
**Chhabra**  
Digitally signed  
by Lohit Chhabra  
Date: 2025.05.07  
12:40:26 +05'30'

Lohit Chhabra  
Company Secretary & Compliance Officer

**Netweb Technologies India Limited**

**Plot No. H-1, Block-H, Pocket No. 9, Faridabad Industrial Town, Sector-57, Faridabad, Haryana  
121004**

**Tel. No. : +91-129-2310400**

**Website : [www.netwebindia.com](http://www.netwebindia.com) ; E-mail : [complianceofficer@netwebindia.com](mailto:complianceofficer@netwebindia.com)**



On Path of  
Professional  
Excellence  
Since 2000

**P.C. JAIN & CO.**

**Company Secretaries**

(Corporate Law & Insolvency Resolution Advisor)

**Annual Secretarial Compliance Report  
of  
NETWEB TECHNOLOGIES INDIA LIMITED  
(CIN: L72100HR1999PLC103911)  
for  
the year ended 31<sup>st</sup> March 2025**

(Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015)

To,  
Netweb Technologies India Limited  
(CIN: L72100HR1999PLC103911)  
Plot No H-1, Pocket 9, Faridabad Industrial Town(FIT),  
Sector-57, , Ballabhgarh, Faridabad, Haryana-121004

I P.C. Jain, Managing Partner of P.C. Jain & Co , Company Secretary in whole-time practice have examined:

- (a) all the documents and records made available to us and explanation provided by **Netweb Technologies India Limited** ("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 year ended 31st March 2025 ("Period Under Review") in respect of compliance with the provisions of:-

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, and guidelines issued there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the regulations, circulars, and guidelines issued there under by the Securities and Exchange Board of India("SEBI");

**The specific regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include: -**

- (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015.
- (b) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
- (c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (**Not Applicable for the period under review**)



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Head Office: #2382, Sector-16, Faridabad (NCR)-121002, India | +91 99530 08338 | ☎ 0129-4043338

Branch Office: #1515, LGF, DLF City, Phase IV, Opposite Galleria Market, Gurugram-122009, India | ☎ 0124-4044338





- (e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity Share) Regulations, 2021;
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable for the period under review)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable for the period under review)**
- (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable for the period under review)**

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 there under, 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 Practising Company Secretary	Management Response	Remarks
	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

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

Sr. No.	Observations/Remarks of the Practising Company Secretary in the previous report	Observations made in the Secretarial Report for the previous year.	Compliance Requirement (Regulations/Circulars/Guidelines including specific clause)	Details of Violation/deviations and action 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
1.	In terms of clause 13 of Schedule B (in the case of listed companies) and clause 11 of Schedule C (in the case of intermediaries and fiduciaries) read with Regulation 9 of the PIT Regulations, the listed companies, promptly informed the Stock Exchange(s) regarding violations relating to CoC under PIT Regulations according to Vide	In terms of clause 13 of Schedule B (in the case of listed companies) and clause 11 of Schedule C (in the case of intermediaries and fiduciaries) read with Regulation 9 of the PIT Regulations, the listed companies, promptly informed the Stock Exchange(s)	As per Regulation 4(1) SEBI (Prohibition of Insider Trading) Regulations, 2015, no insider shall trade in securities that are listed	Execution of trade during the trading window closure period.	The Chief Human Resource Officer of the Company, as directed by the Audit Committee,	The company conducted awareness programme on insider trading for its Designated persons and also issued





Circular No.: <b>SEBI/HO/ISD/ISD/CIR/P/2020/135, dated 23 July 2020.</b>	regarding violations relating to CoC under PIT Regulations according to Vide Circular No.: <b>SEBI/HO/ISD/ISD/CIR/P/2020/135, dated 23 July 2020.</b>	or proposed to be listed on a stock exchange when in possession of unpublished price-sensitive information	have issued a warning letter to the Designated person directing her to refrain from trading in the securities of the Company, in violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with Prevention of Insider Trading and Code of Conduct to Regulate, Monitor and Report Trading in Securities by Insiders Code.	warning letter to violators of Insider Trading.
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(c) I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

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 India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	The Company has complied with the Secretarial Standards issued by ICSI





2.	<b>Adoption and timely updation of the Policies:</b>  All applicable policies under SEBI Regulations are adopted with the approval of the 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	The Company has updated the policies as per SEBI norms and updated the same on its website.
3.	<b>Maintenance and disclosures on the Website:</b>  The Listed entity maintains 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	All the information relating to Directors, Policies, Announcements and other material Information is provided on the website of the Company.
4.	<b>Disqualification of Director:</b>  None of the Directors of the Company is disqualified under Section 164 of the Companies Act, 2013	Yes	None of the Directors of the Board is disqualified as per Section 164 of the Companies Act, 2013.
5.	<b>To examine details related to Subsidiaries of listed entities:</b>  Identification of material subsidiary companies Requirements with respect to disclosure of material as well as other subsidiaries	NA	The Company is not having any material unlisted subsidiary.
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 the Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	The Company maintains data and records in the electronic mode as well as in the physical mode
7.	<b>Performance Evaluation:</b>  The listed entity has conducted a performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	The performance evaluation has been carried out as per SEBI (LODR) Regulations 2015.
8.	<b>Related Party Transactions:</b>  The listed entity has obtained prior approval of the Audit Committee for all Related party transactions In case no prior approval is obtained, the listed entity shall provide detailed reasons along with confirmation of whether the transactions were subsequently approved/ratified/rejected by the Audit Committee	Yes	The Company has undertaken related party transactions with the prior approval of the Audit Committee.
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	All the material events disclosures were made by the company within the prescribed time limit.





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	The Company maintains a proper trail for the disclosure of all material events (Price Sensitive) in electronic mode through Software-based SDD.
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  No Actions were 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	No	During the period under review, no disciplinary actions were taken against Promoter/ Directors/ subsidiaries/ listed entity.
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	No such instances during the review period
13.	<b>Additional Non-compliances, if any:</b>  No any additional non-compliance was observed for all SEBI regulations/circulars/guidance notes etc.	No	No additional non-compliance is observed.

**Assumptions and 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.
- 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.

Place: Faridabad

Date: 03rd May, 2025

UDIN: **FOO41036000258038**

ICSI Peer Review Regd No. : 831/2020

For P. C. Jain & Co.  
Company Secretaries  
(FRN: P2016HR051300)

  
(P.C. Jain)  
Managing Partner  
M. No: FCS 4103  
CP No.3349

