



McLEOD RUSSEL
Believe in tea

27th May, 2026

The Secretary BSE Ltd P. J. Towers, 25 th Floor Dalal Street MUMBAI – 400 001 Scrip Code: 532654	The Secretary National Stock Exchange of India, Listing Dept. Exchange Plaza, 5th Fl. Plot No. C/1, G-Block Bandra-Kurla Complex Bandra(E) MUMBAI – 400 051 Scrip Code: MCLEODRUSS	The Secretary The Calcutta Stock – Exchange Limited 7, Lyons Range KOLKATA – 700 001 Scrip Code: 10023930
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Dear Sir/Madam,

Sub: Disclosure under Regulation 24A(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Please find enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended on 31st March, 2026 issued by Practising Company Secretaries, M/s A. K. Labh & Co.

This intimation is being made available on the website of the Company at www.mcleodrussel.com .

Thanking you,

Yours faithfully,

For Mcleod Russel India Limited

Alok Kumar Samant
Company Secretary

Encl: As above

Registered Office :

McLEOD RUSSEL INDIA LIMITED

Corporate Identity Number (CIN) : L51109WB1998PLC087076

FOUR MANGOE LANE, SURENDRA MOHAN GHOSH SARANI, KOLKATA - 700 001

TELEPHONE : 033-2210-1221, 2248-9434 / 35, FAX : 91-33-2248-8114 / 6265

E-mail : administrator@mcleodrussel.com Website : www.mcleodrussel.com



Secretarial Compliance Report of Mcleod Russel India Limited
for the financial year ended 31.03.2026

We, A. K. Labh & Co., *Company Secretaries*, have examined :

- all the documents and records made available to us and explanation provided by **Mcleod Russel India Limited** (“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 Report,

for the financial year ended 31.03.2026 (“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 to the extent as applicable, include:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR, Regulations 2015”);
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018: **Not Applicable to the Company 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 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) 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) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;
- (i) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2025 regarding the Companies Act and dealing with client;
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 :

Sr. 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 Practising Company Secretary (PCS)	Management Response	Remarks
1	Filing of quarterly Shareholding pattern within 21 days of the end of the quarter	Reg. 31 of The SEBI LODR Regulations, 2015	There was a delay of 1 day in filing the Shareholding Pattern for the quarter ended June 30, 2025. It was filed on July 22, 2025 instead of July 21, 2025	National Stock Exchange of India Limited (NSE) and BSE Limited (BSE).	Fine	Delay in submission of Shareholding Pattern for the quarter ended 30th June, 2026 by 1 day.	NSE and BSE levied Fine of Rs. 2360/- each including GST.	The fine was imposed by NSE and BSE and the same was paid by the Company on 27.08.2025.	The delay was due to technical issues at the RTA end and XBRL validation challenges. The fine was duly paid..	The fine has been paid by the Company



2	Filing of Financial Results (XBRL)	Reg. 33 of The SEBI LODR Regulations, 2015	The Exchange sought clarifications regarding certain discrepancies in the Financial results submitted in XBRL mode	National Stock Exchange of India Limited (NSE) and BSE Limited (BSE).	Clarification	Discrepancies in the Financial results submitted in XBRL mode.	Nil	The Exchange sought clarifications regarding certain discrepancies in the Financial Results submitted in XBRL mode	The clarification sought by NSE and BSE was duly addressed by the Company. The discrepancies were technical/format-related in the XBRL submission and had no impact on the financial results submitted in other formats.	There is no further communication from the Stock Exchanges in this regard
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(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 (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	As informed by the management of the Company, all the compliances have been duly made as required through mail / uploading at The Calcutta Stock Exchange Limited (CSE). The Company is pursuing CSE for revocation of suspension.	31.03.2022 / 31.03.2023 / 31.03.2024 / 31.03.2025	Various Clauses of SEBI LODR Regulations, 2015	Non-compliance of various clauses of SEBI (LODR) Regulations, 2015	CSE has revoked the suspension.	CSE has revoked the suspension of dealing imposed due to non-compliance of Listing Agreement, vide its letter dated 26.06.2025 and admitted the Company for dealing effective from 03.07.2025..





I. We hereby report, 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.	<p>Secretarial Standards :</p> <p>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).</p>	Yes	
2.	<p>Adoption and timely updation of the Policies :</p> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entity. 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 Yes	
3.	<p>Maintenance and disclosures on Website :</p> <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 Yes Yes	
4.	<p>Disqualification of Director :</p> <p>None of the Director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	





5.	<p>Details related to Subsidiaries of listed entity have been examined w.r.t. :</p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>	N.A. N.A.	During the financial year under report, the Company had one wholly owned subsidiary which was not material.
6.	<p>Preservation of Documents :</p> <p>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.</p>	Yes	
7.	<p>Performance Evaluation :</p> <p>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.</p>	Yes	
8.	<p>Related Party Transactions :</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions.</p> <p>(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 N.A.	No such case was reported during the financial year under report .





12.	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>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.</p>	N.A.	No such case was reported during the financial year under report
13.	<p>Additional Non-compliances, if any :</p> <p>No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.</p>	N.A.	None

We further, report that the listed entity is compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of Regulation 46(2) (za) of the SEBI LODR Regulations, 2015 : Not Applicable to the Company during the Review Period.

II. 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 certify 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.

A. K. LABH

FCS, ACMA (ICAI), MBA, M.Com., ACSI (Lond)
DIM, DHRD, PGHDSM, DIRPM
Practising Company Secretary



A. K. LABH & Co.

Company Secretaries

40, Weston Street, 3rd Floor, Kolkata - 700 013

☎ (033) 2221-9381, Fax : (033) 2221-9381

Mobile : 98300-55689

e-mail : aklabh@aklabh.com / aklabhcs@gmail.com

Website : www.aklabh.com

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.



Signature:

Name of the Practising Company Secretary : CS Atul Kumar Labh

FCS No. : 4848

CP No. : 3238

UIN : S1999WB026800

PRCN : 7207/2025

UDIN : F004848H000489783

Place : Kolkata

Dated : 27.05.2026

