POLO QUEEN INDUSTRIAL AND FINTECH LIMITED

Regd. Off : 303/4/ 5, A to Z Industrial Premises, G. K. Marg, Lower Parel (W), Mumbai - 400 013 (INDIA)
CIN NO. L72200MH1984PLC094539

May 30, 2026

To,

The Manager-Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Street, Mumbai - 400 001
Scrip Code: 540717

The Manager-Listing Department
Metropolitan Stock Exchange of India Limited
Vibgyor Towers, 4" Floor, Plot No. C-62, G-Block, Dalal
Bandra-Kurla Complex, Bandra West, Mumbai 400098
Symbol: PQIF

Dear Sir/Madam,

Subject: Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2026.

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI Master circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024, we are enclosing herewith the Annual Secretarial Compliance Report of the Company issued by M/s. Dipti Nagori & Associates, Practicing Company Secretaries, Mumbai, for the Financial Year ended March 31, 2026.

We request you to take the above information on record.

Thanking You,

Yours faithfully,
For **Polo Queen Industrial and Fintech Limited**

GUNJAN KALPESH SANGHAVI

Digitally signed by GUNJAN KALPESH SANGHAVI
Date: 2026.05.30 16:07:00 +05'30'

Gunjan Sanghavi
Company Secretary and Compliance Officer
Membership No.: A74479

Encl: A/a

Tel : (Off) 4537 0000 / 6661 5901 Fax : 6661 5900
E-mail : info@poloqueen.com Website : www.poloqueen.com

Secretarial Compliance Report of Polo Queen Industrial and Fintech Limited
for the year ended 31st March, 2026

To,
Polo Queen Industrial and Fintech Limited
CIN: L72200MH1984PLC094539
304, ATO Z Industrial Estate,
Ganpat Rao Marg,
Lower Parel,
Mumbai – 400013

We Dipti Nagori & Associates have examined:

a) all the documents and records to the extent made available to us and explanations and representations provided by Polo Queen Industrial and Fintech 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, 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable to the company during the review period)
c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable to the company during the review period)
e) The 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) The 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) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
h) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the Review Period:

a) The listed entity has generally 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 Practicing Company Secretary	Management Response	Remarks
1	the chairman of the SRC shall be Non-Executive Director. the Corporate Governance Report submitted by the Company for the quarter ended June, 2025 contains the name of	Non-Compliance with Regulation 20 of SEBI (LODR) Regulations, 2015 – Composition of Stakeholders Relationship Committee (SRC)	Mr. Prabhas Sanghai, who was originally a Non-Executive Director of the Company, was re-designated as an Executive Director. Under the revised	BSE Limited	Fine levied for alleged non-compliance however later it was waived off by the BSE Limited upon submission of satisfactory reply	Mr. Prabhas Sanghai, who was originally a Non-Executive Director of the Company, was re-designated as an Executive	Fine levied for alleged non-compliance however later it was waived off by the BSE Limited upon submission of satisfactory	The Company has complied with the said provisions, The lapse that occurred was purely procedural and inadvertent in nature, without any mala fide intention. Upon being made aware of the error,	The Board reviewed and took note of the matter, along with the subsequent actions taken by the Company, including the waiver application submitted to BSE Limited on September 19,	

	Mr. Prabhas Sanghai, Executive Director, was a chairman of the Committee.		structure, Mr. Natwarlal Gaur was appointed as the Chairperson, and Mr. Prabhas Sanghai was appointed as a Member, while Mr. Shridatta Haldankar continued as a Member. During the filing of the Integrated Governance Report for the quarter ended June 30, 2025, an inadvertent clerical error occurred due to an			Director. Under the revised structure, Mr. Natwarlal Gaur was appointed as the Chairperson, and Mr. Prabhas Sanghai was appointed as a Member, while Mr. Shridatta Haldankar continued as a Member. During the filing of the Integrated Governance Report for the	reply	the Company promptly took corrective steps and uploaded the revised Integrated Governance Report on the Exchange portals.	2025. After detailed deliberation, the Board observed that the discrepancies highlighted by the Stock Exchange arose solely due to an inadvertent clerical error in the filing and did not constitute any actual non-compliance with the Listing Regulations. The Board further noted that no prejudice or adverse impact had been caused to investors, shareholders, or the market at large as a result of the said error. The	

			incorrect selection in the reporting utility. As a result, the names of the Chairperson and Member were mistakenly interchanged, creating the impression of a non-compliance and resulting in the imposition of a penalty.			quarter ended June 30, 2025, an inadvertent clerical error occurred due to an incorrect selection in the reporting utility. As a result, the names of the Chairperson and Member were mistakenly interchanged, creating the impression of a non-compliance and resulting in the			Board also advised the Company Secretary & Compliance Officer to exercise abundant caution in future filings to ensure timely and accurate compliance with the Listing Regulations.	

						imposition of a penalty.				
2	Submission of Annual Report on or before dispatch of Notice	Pursuant to Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company duly uploaded the Notice and Annual Report on the portal of BSE Limited on September 06, 2025. However, the Company could not upload the Annual Report, though the AGM Notice was successfully submitted along with a covering letter	Metropolitan Stock Exchange of India Limited ("Stock Exchange")	Fine of Rs. 50,000 was imposed, which was later waived off upon submission of waiver request by the Company	Delay in submission of Annual Report on the portal of MSEI	Fine of Rs. 50,000 was imposed, which was later waived off upon submission of waiver request by the Company	The Company was required to submit the Annual Report with both the Stock Exchanges within the prescribed timeline. However, as informed by the management, the delay occurred due to a technical issue on the MSEI portal. Accordingly, the report was submitted through the available link; however, a separate copy of the Annual Report was	The Company duly uploaded the Notice and Annual Report on the portal of BSE Limited on September 06, 2025. However, due to a technical glitch on the MSEI portal, the Company could not upload the Annual Report, though the AGM Notice was successfully submitted along with a covering letter containing the link to access the full Annual Report.	

			containing the link to access the full Annual Report.					also required to be uploaded on the MSEI portal.	Accordingly, the requirement relating to submission of the Annual Report should be treated as complied with in substance.	
3	Dissemination of SEBI's Administrative Warning Letter dated May 27, 2025	As per Regulation 30 read with sub-para 20 of Para A Part A of Schedule III of the SEBI (LODR) Regulations, 2015 read with SEBI Master Circular dated January 30, 2026	The Company has submitted the disclosure along with its reply on May 30, 2025	BSE Limited	non-adherence to the prescribed timelines on your part is viewed seriously. Accordingly, you are hereby advised to be careful in future, exercise due diligence and initiate corrective steps to avoid recurrence of such incidents so as to	The said event disclosed to the Stock Exchanges on May 30, 2025	Nil	The event shall be disclosed within 24 hours of the occurrence of event	The Company received the aforesaid communication on May 28, 2025, and the same was immediately placed before the Board of Directors at the Board Meeting held on the same day, which had already been convened for considering other agenda items. Considering the	

					ensure due compliance with the applicable provisions of the SEBI (LODR) Regulations, 2015 and relevant /applicable SEBI circulars.				nature and significance of the matter, the Board deliberated upon the same and authorized Mr. Prabhas Sanghai to submit an appropriate reply to SEBI and undertake the necessary intimations to the Stock Exchange(s). Subsequently, the draft response was prepared, finalized, and after completion of the necessary internal discussions and approvals, the disclosure was uploaded with the Stock Exchange(s	

									) at around 11:11 AM on May 30, 2025.	

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

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 Practicing Company Secretary	Management Response	Remarks
NOT APPLICABLE										

Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR):

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS*
1.	Secretarial Standard The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	

2.	Adoption and timely updation of the Policies: • 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	
3.	Maintenance and disclosures on Website: • 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	
4.	Disqualification of Director: None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	
5.	To examine 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	Yes	
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	

7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees every financial year /during the financial year as prescribed in SEBI Regulations.	Yes	
8.	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.	Yes	
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	
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
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 (**).	NIL	
12.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NIL	

*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or '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 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.
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: Mumbai
Date: 29th May, 2026

For Dipti Nagori & Associates
Practicing Company Secretaries

Dipti Nagori
Proprietor
C.P. No. 9917
Peer Review Certificate No: 1902/2022
UDIN-F008603H000539958