Registered Office :
1202, 12th Floor, Esperanza Building,
Next to Bank of Baroda, 198, Linking Road,
Bandra (W), Mumbai - 400 050. India
Tel. : 9819001811 www.sparcelectrex.com
Email : info@sparcelectrex.com / sparcelectrex@gmail.com
CIN:L31100MH1989PLC053467 GST NO.:27AAECS2631Q1ZY

SPARC ELECTREX LIMITED

Date: 31.05.2025

To,
The Bombay Stock Exchange Ltd
Corporate Relationship Dept,
1st Floor, New Trading Ring,
Rotunda Building, P. J. Towers,
Dalal Street, Fort, Mumbai – 400 001

Dear Sir/Madam,

Scrip Code: 531370
Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2025 as per Regulation 24A of SEBI (LODR) Regulations, 2015

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; please find enclosed herewith Annual Secretarial Compliance Certificate issued by M/s. Madhuri J. Bohra & Associates (COP No: 20329), Practicing Company Secretaries for the financial year ended on March 31, 2025 under Regulation 24A of Securities Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulations, 2015.

We request you to kindly take the same on record.

For Sparc Electrex Limited

SHOBITH GANESH HEGDE

Digitally signed by SHOBITH GANESH HEGDE
DN: c=IN, postalCode=400050, st=MAHARASHTRA, street=MUMBAI, l=MUMBAI, o=Personal, serialNumber=43c7bfb0803483a745c6d59a5927d28a8cfb96189420b129894fb0ae4d41a2262, pseudonym=69c9c6689d2149b6994fd1130963 0cb8, 2.5.4.20=8fe2844a1b865b1db2859f0e2794ee222644e4312248 2f9319c7aae2be52ad4d, email=SHOBITHEGDE@HOTMAIL.COM, cn=SHOBITH GANESH HEGDE
Date: 2025.05.31 18:30:35 +05'30'

SPARC ELECTREX LIMITED MUMBAI

Shobith Ganesh Hegde
(Managing Director))
DIN: 02211021
Place: Mumbai

Encl: a/a

MADHURI J. BOHRA & ASSOCIATES

Company Secretaries

301-304, Acme Industrial Park I. B. Patel Road, Goregaon East, Mumbai - 400063

M: +918655559088 Email Id: csmadhuribohra@gmail.com

Secretarial Compliance Report of Sparc Electrex Limited
For the year ended March 31, 2025
([Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
Sparc Electrex Limited
1202, 12th Floor, Esperanza Building,
Next to Bank of Baroda, Linking Road,
Bandra (West), Mumbai - 400050

I have conducted the review of the Compliance of the applicable Statutory Provisions and the adherence to good corporate practices by Sparc Electrex Limited (hereinafter referred as "the listed entity"). The Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my observations thereon.

Based on my records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that the listed entity has, during the review period covering the financial year ended on **31st March, 2025** complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I, Madhuri Bohra, Proprietor of M/s. Madhuri J. Bohra & Associates, have examined:

1. All the documents and records made available to me and explanation provided by **M/s. Sparc Electrex 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 for the year under review.***

(v) Securities and Exchange Board of India (Share Based Employee Benefits & Sweat Equity) Regulations, 2021; ***Not Applicable for the year under review.***

(vi) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; ***Not Applicable for the year under review.***

(vii) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and circulars/ guidelines issued thereunder.

(viii) Securities and Exchange Board of India (Depositories and Participant Regulation), 2018 and circulars / guidelines issued thereunder.

(ix) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 Not Applicable for the year 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 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	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	In terms of Regulation 14 of SEBI (LODR), Reg, 2015 the Listed entity is required to make payment of Annual Listing Fee within 30 days of end of each financial year.	Regulation 14	The Company is pending for payment of annual listing fees for F.Y. 2025-26, which company was required to pay on or before 30.04.2025.	No action taken	No action taken	The Company has not paid Annual Listing fee for F.Y. 2025-26, which Company was required to pay on or before 30.04.2025.	The Company will pay the interest on late payment.	Said delay / non-payment of listing fees in stipulated time is non-compliance of Regulation 14 of SEBI (LODR), Reg, 2015. The Company should pay it at earliest.	The Company will pay said listing fee in due course of time with necessary interest.	-
2	In terms of Regulation 47 of SEBI (LODR), Reg, 2015 The listed entity shall publish advertisement in newspaper, within 48 hours of conclusion of the meeting of Board of Directors at which the	Regulation 47(1) of SEBI (LODR), Reg, 2015	The Company has not given Quick Response Code for the financial results published by the Company for quarter ended 31.12.2024.	No action taken	No action taken	The Company has published its financial statements for quarter ended 31.12.2024 without giving Quick Response code.	-	The Reg 47(1) of LODR, Regulations, 2015, W.e.f. 13.12.2024 mandate to listed entities to publish financial results with Quick Response Code. The QR Code was missing in publication	The Company will comply with the requirement of said regulations for all its future publications to be made in newspaper.	-

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C P No. 20329
Practicing Company Secretary

	financial results were approved, containing a Quick Response code and the details of the webpage where complete financial results of the listed entity is accessible to the investors.							made by the Company for its financial results for quarter ended 31.12.2024. The Company should start publishing its financial as per the requirements of Reg 47(1) of SEBI (LODR) Reg, 2015.		
3	Pursuant to BSE Notice No. 20230127-37 Notice Date 27th Jan 2023, all Listed entities are required to make reporting in XBRL mode within 24 hours of submission of the PDF filing w.r.t issue, allotment of Securities or change in capital	Pursuant to BSE Notice No. 20230127-37 Notice Date 27th Jan 2023	The Company was required to file XBRL within 24 hours of pdf reporting made to exchange on 20.04.2024 in connection with the conversation / allotment of p 15,48,958 partly paid up shares into fully paid-up upon calling and payments of call money thereon.	No action taken	No action taken	The Company has not done XBRL reporting within 24 hours of pdf reporting made to exchange on 20.04.2024 in connection with the conversation / allotment of p 15,48,958 partly paid up shares into fully paid-up upon calling and payments of call money thereon.	No fine has been levied	Such non-filing in XBRL forms is the non-compliance on part of the Company of BSE Notice No. 20230127-37 Notice Date 27th Jan 2023. The Company should take utmost care in all further reporting's.	The management submitted that the mentioned non-filing was purely unintentional and was due to unawareness of fact of XBRL reporting in such cases. However Company has made all necessary reporting in pdf filing mode including Listing and Trading approvals and such approval has been granted by the exchange. The	

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Practicing Company Secretary

	structure of the Company.								Company will ensure all such XBRL reporting for future reporting.	

(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
1	Pursuant to BSE Notice No. 20230127-37 Notice Date 27th Jan 2023, all Listed Companies required to file also prior intimation of calling Board meeting in XBRL mode under Regn 29 of the SEBI (LODR) Regn, 2015 within 24 hours of submission of the PDF filing.	BSE Notice No. 20230127-37 Notice Date 27th Jan 2023	Delay of 1 day in filing of XBRL Intimation of Board meeting, of which pdf intimation calling meeting was given by the Company to the exchange on 18.03.2024 and XBRL intimation was filed on 20.03.2024.	None	No Action is taken by any authority	Delay of 1 day in filing of XBRL Intimation of Board meeting, of which pdf intimation calling meeting was given by the Company to the exchange on 18.03.2024 and XBRL intimation was filed on 20.03.2024.	No fine has been levied	Such delay in XBRL filing is the non-compliance on part of the Company of BSE Notice No. 20230127-37 Notice Date 27th Jan 2023. The Company should take utmost care in all further reporting's.	The management submitted that the mentioned delay was unintentional and was due to oversight. The Company has made all other intimation calling Board meeting in pdf and XBRL on same day and in timely manner during the year. Further the Company will ensure no such delay for any future submission on this.	-

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2	Pursuant to BSE Notice No. 20230331-87 dated 31st March 2023, readwith Regn 30 of SEBI (LODR), Regn, 2015, w.e.f. April 01, 2023 the listed entity is required to also submit the Notices of Shareholders Meeting in XBRL mode within 24 hours of submission of the said PDF filing.	BSE Notice No. 20230331-87 dated 31st March 2023, readwith Regn 30 of SEBI (LODR), Regn, 2015,	Delay of 2 day in filing of XBRL Intimation of Calling EOGM, of which pdf intimation calling EOGM was given by the Company to the exchange on 31.03.2023 and XBRL intimation was filed on 03.04.2023.	None	No Action taken by any authority	Delay of 2 day in filing of XBRL Intimation of Calling EOGM, of which pdf intimation calling EOGM was given by the Company to the exchange on 31.03.2023 and XBRL intimation was filed on 03.04.2023.	No fine has been levied	Such delay in XBRL filing is the non-compliance on part of the Company BSE Notice No. 20230331-87 dated 31st March 2023. As informed by the management this circular was mandated XBRL reporting w.e.f. 01.04.2023. However Co. had completed dispatch of notice for the EOGM on before 31.03.2023. The Company has made XBRL reporting for this voluntarily.	The management submitted that the mandate of this XBRL filing is applicable w.e.f. 01.04.2023, so any meeting called on or after 01.04.2023, in that case the Company has to follow such circular. In our case we had completed all formalities including dispatch of EGM notice on 31.03.2023. However the Company has made such reporting voluntary in good faith and for good corporate governance and management does not consider it's a delay for this particular case.	-
3	Pursuant to BSE Notice No. 20230127-37 Notice Date 27th Jan 2023,	Pursuant to BSE Notice No. 20230127-37 Notice	The Company has not made XBRL filing in connection with the allotment of	None	No Action taken by any authority	The Company has not made XBRL filing in connection with the allotment of	No fine has been levied	Such non-filing in XBRL forms is the non-compliance on part of the	The management submitted that the mentioned delay was purely unintentional and	-

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Practicing Company Secretary

	all Listed Companies required to make reporting in XBRL mode within 24 hours of submission of the PDF filing w.r.t issue, allotment of Securities or change in capital structure of the Company.	Date 27th Jan 2023	security made by the Company during the year under issue in case of Right issue of partly paid-up shares and further in case conversation of these partly paid up shares into fully paid-up upon calling and payments of call money.			security made by the Company during the year under issue in case of Right issue of partly paid-up shares and further in case conversation of these partly paid up shares into fully paid-up upon calling and payments of call money.		Company of BSE Notice No. 20230127-37 Notice Date 27th Jan 2023. The Company should take utmost care in all further reporting's.	was due to unawareness of fact of XBRL reporting in such cases. However Company has made all necessary reporting in pdf filing mode including Listing and Trading approval and such approval has been granted by the exchange. The Company will ensure all such XBR reporting for future references and reporting.	

Additional affirmations to be given by Practicing Company Secretarial Compliance Report (ASCR) pursuant to BSE & NSE vide Notice no. 20230316-14 and Circular Reference No. NSE/CML/2023/21 dated March 16, 2023 are provided below:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/Remarks by PCS*
1	**Secretarial Standard** The compliances of listed entities are in accordance with the Secretarial Standards issued by the Institute of Company Secretaries of India (ICSI).	Yes	The Company has generally complied with Secretarial Standards with respect to Meetings of the Board of Directors (SS-1) and General Meetings (SS-2) issued by the Institute of Company secretaries of India.
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	-

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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	The Company has maintained fully functional website at https://sparcelectrex.com (Subject to occurrences of the technical glitches in access to some data after the date of this report).
4	**Disqualification of Director:** None of the Director 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.	NA	The Company does not have subsidiary.
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 at the start of every 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	The Company has obtained necessary prior approval of Audit Committee for all Related Party transactions.
9	**Disclosure of events or information:** The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith 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) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	The Company has an Insider Trading Software installed at its registered office, in which necessary entries pertains of UPSI were recorded during the year under review.



11	**Actions taken by SEBI or Stock Exchange(s), if any:** No Actions taken against the listed entity/ it's 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	NA	As confirmed by the Management, no Actions has been taken against the listed entity/ its promoters/ directors 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 during the review period, except as follows. However the BSE has imposed fine of Rs.46,020/- on Company vide its email dated 22.02.2024 towards non-compliance of requirement of Regulation 6(1) of SEBI (LODR), Regulations, 2015. The Company vide its email dated 23.02.2024 suitably replied to the exchange about no such non-compliance by the Company with proper justification and proofs on records. The exchange has taken on record the reply of the Company and advice the Company vide its email dated 26.02.2024 for filing waiver application with waiver fees, The Company had filed waiver application on 07.03.2024 through Listing portal under the head Listing operation - Listing Module - Waiver. Despite submitting the Application properly, the Status of waiver Application is under process with Listing Operation team.
12	**Additional Non-compliances, if any:** No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NA	No any additional non-compliance observed during reporting period.

*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

Compliances related to resignation of Statutory Auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/Remarks by PCS*
1	**Compliances with the following conditions while appointing/re-appointing an auditor** • If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the	Not Applicable	There is no instance of resignation of Statutory Auditors from the Company during the reporting period.



	limited review/ audit report for such quarter; or • If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or • If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.		
2	**Other conditions relating to resignation of statutory auditor** **(i) Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:** • In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings. • In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable. • The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.	Not Applicable	There is no instance of resignation of Statutory Auditors from the Company and the Company does not have any Subsidiary / Material Subsidiaries. Hence, disclosures in such respect are not applicable to the Company during reporting period.

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	(ii) <u>Disclaimer in case of non-receipt of information:</u> The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ it's material subsidiary has not provided information as required by the auditor.		
3	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	Not Applicable	There is no instance of resignation of Statutory Auditors from the Company and the Company does not have any Subsidiary / Material Subsidiaries. Hence, disclosures in such respect are not applicable to the Company during reporting period.

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 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 Madhuri J. Bohra & Associates
Practicing Companies Secretaries
ACS No.: 54739| C P No.: 20329
Peer Review: 4209/2023

MADHURI JANKILAL BOHRA
Digitally signed by MADHURI JANKILAL BOHRA
Date: 2025.05.30 10:07:28 +05'30'



Madhuri J. Bohra
(Proprietor)
UDIN: A054739G000516651
Place: Mumbai
Date: 30/05/2025