

# CONCORD BIOTECH LIMITED

B-1601-1602, B-wing Mondeval Heights, Iskcon Cross Road, S. G. Highway, Ahmedabad-380015, Gujarat.

Phone : +91-79-68138700 Fax : +91-79-68138725 CIN No.: L24230GJ1984PLC007440

Email ID: [complianceofficer@concordbiotech.com](mailto:complianceofficer@concordbiotech.com)

May 30, 2025

|                                                                                                                                                                                                 |                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| To<br>The Manager, Listing Department<br><b>National Stock Exchange of India Ltd.</b><br>Plot No. C/1 G Block,<br>Bandra-Kurla Complex, Bandra (East),<br>Mumbai -400 051<br>Symbol: CONCORDBIO | To<br>General Manager, Listing Department<br><b>BSE Limited</b><br>Phiroze Jeejabhoy Towers,<br>Dalal Street,<br>Mumbai – 400 001<br>Scrip Code: 543960 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|

Dear Sir/Ma'am,

**Sub.: Annual Secretarial Compliance Report for the financial year ended March 31, 2025**

**Ref: Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulation (Amendment), 2018.**

Pursuant to the Regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements) Regulation (Amendment) 2018, please find enclosed Annual Secretarial Compliance Report for the year ended 31.03.2025

**For Concord Biotech Limited**

**Hina Patel**  
**Company Secretary and Compliance Officer**  
**M. No. A56541**

Encl: As above



# ASHISH SHAH & ASSOCIATES

Company Secretaries & Trade Mark Agent | Insolvency Resolution Professional

402, "Shaival Plaza", 4<sup>th</sup> Floor, Gujarat College Road, Besides Hope Hospital, Ellisbridge, Ahmedabad - 380 006.  
Mobile: 098259 40391 | Tel: 079-26420336/7/9 | E-mail: ashish@ravics.com

## Secretarial Compliance Report of CONCORD BIOTECH LIMITED for the financial year ended 31<sup>st</sup> March 2025

I, Ashish Shah has examined:

- (a) all the documents and records made available to us and explanation provided by CONCORD BIOTECH 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 31<sup>st</sup> 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:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **during the review period the said regulations were not applicable to the listed entity.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **during the review period the said regulations were not applicable to the listed entity.**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **during the review period the said regulations were not applicable to the listed entity**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;





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- (h) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993; **during the review period the said regulations were not applicable to the listed entity.**
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **during the review period the said regulations were not applicable to the listed entity.**
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and circulars/ guidelines issued thereunder;

I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

| Sr. No. | Particulars                                                                                                                                                                                                                                                                                                                                                                                                  | Compliance Status (Yes/No/NA) | Observations /Remarks by PCS* |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-------------------------------|
| 1.      | <b>Secretarial Standards:</b><br><br>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                           | -                             |
| 2.      | <b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li><li>● All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li></ul> | Yes<br><br>Yes                | -<br><br>-                    |





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|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                           |                     |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|---------------------|
| 3. | <b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>● The Listed entity is maintaining a functional website</li><li>● Timely dissemination of the documents/ information under a separate section on the website</li><li>● 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</li></ul> | Yes<br><br>Yes<br><br>Yes | -<br><br>-<br><br>- |
| 4. | <b>Disqualification of Director:</b> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013</p>                                                                                                                                                                                                                                                                                                      | Yes                       | -                   |
| 5. | <b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> <ul style="list-style-type: none"><li>(a) Identification of material subsidiary companies</li><li>(b) Disclosure requirement of material as well as other subsidiaries</li></ul>                                                                                                                                                                                 | Yes<br><br>Yes            | -<br><br>-          |
| 6. | <b>Preservation of Documents:</b> <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. | <b>Performance Evaluation:</b> <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                       | -                   |





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Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:

| Sr. No. | Particulars                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Compliance Status (Yes/No/NA)   | Observations /Remarks by PCS*                                                                                         |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| 1.      | <b>Compliances with the following conditions while appointing/re-appointing an auditor</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                 |                                                                                                                       |
|         | <p>i. 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 limited review/ audit report for such quarter; or</p> <p>ii. 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</p> <p>iii. 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.</p> | <p>NA</p> <p>NA</p> <p>N.A.</p> | <p>There has been no resignation of the statutory auditor during the relevant Financial Year.</p>                     |
| 2.      | <b>Other conditions relating to resignation of statutory auditor.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                 |                                                                                                                       |
|         | <p>a. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>i. 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</p>                                                                                                                                                                                                                                                                                                                                                          | <p>No</p>                       | <p>No concern has been raised in writing by the Auditor with respect to the listed entity to the Audit Committee.</p> |





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|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |    |                                                                                                                                                                                                                             |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | <p>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.</p> <p>ii. 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.</p> <p>iii. 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.</p> <p>b. Disclaimer in case of non-receipt of information:<br/>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/ its material subsidiary has not provided information as required by the auditor.</p> |    | <p>No proposal of resignation has been received from the Auditor during the relevant Financial Year</p> <p>No such information has been received from the Auditor.</p> <p>No<br/>There is no disclaimer in this report.</p> |
| 3. | <p>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 18<sup>th</sup> October, 2019.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | No | <p>There has been no resignation of the statutory auditor during the relevant Financial Year.</p>                                                                                                                           |

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

(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:





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- (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 |
|----------------|-------------------------------------------------------------------------------------|-------------------------|------------|-----------------|------------------------------------------------------------------|----------------------|-------------|----------------------------------------------------------|---------------------|---------|
|                |                                                                                     |                         |            |                 | Advisory / Clarification / Fine/Show Cause Notice/ Warning, etc. |                      |             |                                                          |                     |         |
| Not Applicable |                                                                                     |                         |            |                 |                                                                  |                      |             |                                                          |                     |         |





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(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                                                  | Details of Violation | Fine Amount | Observations/ Remarks of the Practicing Company Secretary | Management Response | Remarks |
|----------------|---------------------------------------------------------------------------------------|--------------------------|------------|-----------------|-----------------------------------------------------------------|----------------------|-------------|-----------------------------------------------------------|---------------------|---------|
|                |                                                                                       |                          |            |                 | Advisory / Clarification/ Fine/Show Cause Notice/ Warning, etc. |                      |             |                                                           |                     |         |
| Not Applicable |                                                                                       |                          |            |                 |                                                                 |                      |             |                                                           |                     |         |

Place: Ahmedabad

Date: 28.05.2025

For, Ashish Shah & Associates

Company Secretaries

Signature:  
Ashish Shah  
Proprietor  
Mem. No. FCS: 5974  
CPNo.: 4178  
UDIN: F005974G000470053

