

# HARIG CRANKSHAFTS LIMITED

**CIN:- L35999UP1983PLC026603, Website:www.harigcrankshafts.com**

**Regd office:- Plot No 66, Udyog Vihar, Gautam Buddha Nagar, Greater Noida, Uttar Pradesh-201306, India**

**Email Id:-[harig@harigcrankshafts.com](mailto:harig@harigcrankshafts.com); GSTIN: 09AAACH1275R2Z2, Phone no.-9818105480**

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**Date: 30.05.2025**

**To**  
**BSE Limited,**  
**Floor 25, P.J. Towers, Dalal Street,**  
**Mumbai 400 001**

**BSE Scrip Code: 500178**

**Sub: Annual secretarial Compliance Report for the year ended 31<sup>st</sup> March 2025**

Dear Sir/Maam,

Pursuant to Regulation 24A of SEBI(Listing Obligations and Disclosure Requirements) Regulations 2015, as amended read with SEBI Circular no. CIR/ICFD/CMD1/27/2019 dated 8<sup>TH</sup> February 2019, we are submitting herewith the Annual Secretarial Compliance Report of the Company, for the financial year ended 31<sup>st</sup> March 2025, issued by Mr. Debabrata Deb Nath, Partner of M/s R&D Company Secretaries.

You are requested to kindly take the same on record.

Thanking you.

Yours faithfully,  
**Harig Crankshafts Limited**

**Komal Agarwal**  
**Company Secretary & Compliance Officer**

# R & D

## COMPANY SECRETARIES

### Annual Secretarial Compliance Report of Harig Crankshafts Limited for the financial year ended 31<sup>st</sup> March 2025

*(Pursuant to regulation 24A of Securities and Exchange Board of India (Listing  
Obligation and Disclosure Requirement) Regulation, 2015)*

To

**Harig Crankshafts Limited**

Regd. Office: Plot No. 66, Udyog Vihar  
Greater Noida, I.A. Surajpur, Gautam Buddha Nagar  
Noida-201306, Uttar Pradesh

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Harig Crankshafts Limited (hereinafter referred as 'the listed entity'), having its Registered Office at Plot No. 66, Udyog Vihar, Greater Noida, I.A. Surajpur, Gautam Buddha Nagar, Noida-201306, Uttar Pradesh. Secretarial Review was conducted in a manner that provided us with a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other 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, we hereby report that the listed entity has, during the review period covering the financial year ended on 31<sup>st</sup> March 2025, complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

We, M/s R & D Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Harig Crankshafts 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 report, for the year ended 31<sup>st</sup> March 2025, 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");

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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; **(Not Applicable to the listed entity during the review period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable to the listed entity during the review period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the listed entity during the review period)**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 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	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	The listed entity shall ensure that approval of shareholders for appointment or reappointment of a person on the board of directors or as a manager is taken at the next general meeting or within a time period of three months from the date of appointment, whichever is earlier.	Regulation 17(1C)(a) of SEBI (Listing Obligations and Disclosure Requirements) 2015 ("SEBI LODR Regulations")	The Company has appointed Mr Manoj Agarwal, Ms Pragma Agarwal, Mr Manoj Kumar and Mr Rajveer Singh on 17 <sup>th</sup> May, 2024. However, their appointment were not approved by the shareholders within 3 months.	No objection has been taken by the SEBI	N.A.	The Company has appointed Mr Manoj Agarwal, Ms Pragma Agarwal, Mr Manoj Kumar and Mr Rajveer Singh on 17 <sup>th</sup> May, 2024. However, their appointment were not approved by the shareholders within 3 months.	Not levied by SEBI for Stock Exchange till date.	The Company has appointed Mr Manoj Agarwal, Ms Pragma Agarwal, Mr Manoj Kumar and Mr Rajveer Singh on 17 <sup>th</sup> May, 2024. However, their appointment were not approved by the shareholders within 3 months.	Pursuant to the NCLT Approved Resolution submitted by Palika, The Agarwal, Ms Pragma Agarwal, Mr Manoj Kumar and Mr Rajveer Singh on 17 <sup>th</sup> May, 2024. However, their appointment were not approved by the shareholders within 3 months.	The Company has appointed Mr Manoj Agarwal, Ms Pragma Agarwal, Mr Manoj Kumar and Mr Rajveer Singh on 17 <sup>th</sup> May, 2024. However, their appointment were not approved by the shareholders within 3 months.





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2.	The listed entity shall ensure approval of shareholders for appointment or reappointment of a person on the board of directors or as a manager is taken at the next general meeting or within a time period of three months from the date of appointment, whichever is earlier.	Regulation 17(1C)(a) of SEBI (Listing Obligations and Disclosures Requirements, 2015) ("SEBI Regulations")	The Company has appointed Mr. Agarwal as Managing Director on 17 <sup>th</sup> May, 2024. However, their appointment was not approved by the shareholders within 3 months.	No action has been taken by the Company as the appointment was not approved by the shareholders within 3 months.	N.A.	The Company has appointed Mr. Agarwal as Managing Director on 17 <sup>th</sup> May, 2024. However, their appointment was not approved by the shareholders within 3 months.	Not yet levied by SEBI for Stock Exchange till 17 <sup>th</sup> May, date.	The Company has appointed Mr. Agarwal as Managing Director on 17 <sup>th</sup> May, 2024. However, their appointment was not approved by the shareholders within 3 months.	The Company has appointed Mr. Agarwal as Managing Director on 17 <sup>th</sup> May, 2024. However, their appointment was not approved by the shareholders within 3 months.	Mr. Agarwal was appointed on 17 <sup>th</sup> May 2024 as Managing Director. However, since the company was not in operation since May, 2011, post CIRP transitional challenges in not delay in operationalizing approved by the statutory shareholders within the 3 months to which the company could hold the EGM/AGM within the prescribed period. The allotment and	The Company has appointed Mr. Agarwal as Managing Director on 17 <sup>th</sup> May 2024 as Managing Director. However, since the company was not in operation since May, 2011, post CIRP transitional challenges in not delay in operationalizing approved by the statutory shareholders within the 3 months to which the company could hold the EGM/AGM within the prescribed period. The allotment and
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3.	The quarterly and year-to-date financial results shall be approved by the Board of Directors within 45 days from the end of quarter	Regulation 33(3)(a) of SEBI (Listing Obligations and Disclosures Requirements, 2015 ("SEBI LODR Regulations))	The Company has approved its result for the quarter and year to date ended 30th June, 2024 and 30th September, 2024 beyond 45 days i.e. in their meeting held on 14th February, 2025	No	N.A.	The Company has approved its result for the quarter and year to date ended 30th June, 2024 and 30th September, 2024 beyond 45 days i.e. in the meeting held on 14th February, 2025	Not yet levied by SEBI for the Stock Exchange till date.	The Company has approved its result for the quarter and year to date ended 30th June, 2024 beyond 45 days i.e. which impacted our 2024 and 30th September, 2024	The Company has approved its result for the quarter and year to date ended 30th June, 2024 beyond 45 days i.e. in the meeting held on 14th February, 2025	Due to recent change in the management and non-its result approved for the quarter Financial Statements for and year the previous to date ended 30th September, 2024	The Company has approved its result for the quarter and year to date ended 30th June, 2024 beyond 45 days i.e. in the meeting held on 14th February, 2025
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4. The annual audited financial results for the financial year shall be approved by the Board of Directors within 60 days from the end of financial year	Regulation 33(3)(a) of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 ("SEBI LODR Regulations")	The Company has approved its audited financial results for the financial year ended 31 <sup>st</sup> March, 2024 beyond 60 days i.e. in the meeting held on 6 <sup>th</sup> December, 2024	N.A.	The Company has approved its audited financial results for the financial year ended 31 <sup>st</sup> March, 2024 beyond 60 days i.e. in the meeting held on 6 <sup>th</sup> December, 2024	Not yet levied by SEBI or Stock Exchange till date.	The Company has approved its audited financial results for the financial year ended 31 <sup>st</sup> March, 2024 beyond 60 days i.e. Company, in the meeting held on 6 <sup>th</sup> December, 2024	Due to recent change in management and non-availability of audited Financial Statements for the previous years of the financial year, the Company, which has ended our 31 <sup>st</sup> March, to March, 2024, appoint an auditor in a timely manner.	The Company has approved its annual financial results for the financial year ended 31 <sup>st</sup> March, 2024 beyond 60 days i.e. in the meeting held on 6 <sup>th</sup> December, 2024
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5.	Filing of statement detailing the redressal of investor grievances on quarterly basis within 21 days from the end of quarter	Regulation 13(3) of SEBI (Listing Obligations and Disclosures) Regulations, 2015 ("SEBI LODR Regulations)	The Company has not filed statement for quarter ended March, 2024	No action has been taken by the SEBI or Stock Exchange till date.	N.A.	The Company has filed statement for quarter ended 31st March, 2024	No action has been taken by the SEBI or Stock Exchange till date.	The Company has not filed the statement for the quarter ended 31st March, 2024	Pursuant to the Approved Resolution Plan submitted by Palika,, The Board of Directors being appointed on March, 17.05.2024 is 2024 being responsible for the prospective quarters/ yearly compliances, the captioned data pertains to the period prior to the appointment and being the responsibility of erstwhile management or Resolution Professional.	The Company has not filed the statement for the quarter ended 31st March, 2024	The Company has not filed the statement for the quarter ended 31st March, 2024
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6.	Filing of Corporate Governance report on quarterly basis within 21 days from the end of quarter	Regulation 27(2) of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 ("SEBI LODR Regulations")	The Company has not filed Corporate Governance report for the quarter ended 31 <sup>st</sup> March, 2024	No action has been taken by the SEBI or Stock Exchange till date.	N.A.	The Company has not filed Corporate Governance report for the quarter ended 31 <sup>st</sup> March, 2024	No action has been taken by the SEBI or Stock Exchange till date.	The Company has not filed the Corporate Governance report for the quarter ended 31 <sup>st</sup> March, 2024	Pursuant to the NCLT Approved Resolution Plan submitted by Palika,, The Board of Directors being appointed on 17.05.2024 is responsible for the quarter ended 31 <sup>st</sup> March, 2024	The Company has not filed the Corporate Governance report for the quarter ended 31 <sup>st</sup> March, 2024	Pursuant to the NCLT Approved Resolution Plan submitted by Palika,, The Board of Directors being appointed on 17.05.2024 is responsible for the quarter ended 31 <sup>st</sup> March, 2024	The Company has not filed the Corporate Governance report for the quarter ended 31 <sup>st</sup> March, 2024
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8.	Filing of Quarterly Reconciliation of Share Capital Audit (Depositories) report within 30 days of the end of quarter	Regulation 76 of SEBI (Depositories) Regulations, 2018	Company has not filed Reconciliation of Share Capital Audit report for quarter ended March, 2024	No action has been taken by SEBI or Stock Exchange till date.	N.A.	Company has filed Reconciliation of Share Capital Audit report for the quarter ended March, 2024	No action has been taken by SEBI or Stock Exchange till date.	Company has not filed Reconciliation of Share Capital Audit report for the quarter ended March, 2024	Pursuant to the Approved Resolution Plan submitted by Palika,, The Board of Directors being appointed on the 17.05.2024 is being responsible for the prospective quarters/ yearly compliances, the captioned data pertains to the period prior to the appointment and being the responsibility of erstwhile management or Resolution Professional.	Company has not filed the Reconciliation of Share Capital Audit report for the quarter ended March, 2024
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9.	Filing of detail of Related Party transaction for the half year along with financial results of the Company	Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements), 2015 ("SEBI LODR Regulations")	Company has not filed the Related party transaction for the half year ended 30 <sup>th</sup> September, 2024	No action has been taken by SEBI or Stock Exchange till date.	N.A.	Company has filed the Related party transaction for the half year ended 30 <sup>th</sup> September, 2024	No action has been taken by SEBI or Stock Exchange till date.	Company has not filed the Related transaction for the half year ended 30 <sup>th</sup> September, 2024	Due to recent change in management and non-party availability of Financial Statements for the half year the previous ended years of the 30 <sup>th</sup> Company and September other poster, 2024 CIRP transitional challenges, which has impacted our ability to provide the same.	Company has not filed the Related transaction for the half year ended 30 <sup>th</sup> September, 2024
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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 Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March, 2024 (the years are mentioned)	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of violation / deviation 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
Not Applicable						

(c) We 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> 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).	Yes	The Company has complied the Secretarial Standards 1 and 2.
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  Yes	We have examined that the Company has adopted the policies required under SEBI regulations after resolution plan duly approved under section 31 of the Insolvency and Bankruptcy Code.





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  Yes  Yes	We have examined that the Company is maintaining the website from the financial year 2024.
4.	<b>Disqualification of Director:</b> None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity	Yes	We have examined the DIR-8 submitted by all the Director(s) of the Company.
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes  Yes	The Company has identified that it has no material subsidiary during the period under review and mentioned the same in its Board Report.
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 Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	The Company has been taken over by the new Promoters regulations after resolution plan duly approved under section 31 of the Insolvency and Bankruptcy Code. Consequently, few documents and records are available from earlier management.





7.	<b>Performance Evaluation:</b> 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.	Yes	
8.	<b>Related Party Transactions:</b> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	No  NA	The Company has confirmed that there was no related party transaction entered into by the Company except the appointment of Mr Payas Agarwal as CFO of the Company after taking approval from NRC Committed, Audit Committee and Board of Directors.
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	As per the information provided by the Management of the Company, all material information under Regulation 30 were intimated to the Stock Exchange(s) within time limits.
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	





11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> 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 (**).	N/A	No actions have been taken by SEBI or Stock Exchange(s) for the period under review, as stated by the Management.
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.	N/A	There was no resignation of statutory auditors from the Company or its material subsidiary
13.	<b>Additional non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	N/A	No additional non-compliance with any SEBI regulations, circulars, guidance notes, or other directives has been observed, other than those specifically mentioned elsewhere in this report.





**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.
5. The Audit was conducted in accordance with the Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India (ICSI), involving such examinations and verifications as deemed necessary and adequate for the purpose.

**For R&D  
Company Secretaries**

**Debabrata Deb Nath  
Partner**

**FCS: 7775, C P No.: 8612**

**Peer Review Certificate No: 1403/2021**

**Unique Identification No: P2005DE011200**

**UDIN: F007775G000513951**

**Date: 30.05.2025**

**Place: Delhi**