SILVERLINE

CIN: L46209MH1992PLC066360

Date: 29th May, 2025

To,
BSE Limited
Corporate Relations Department,
1st Floor, New Trading Ring,
P. J. Towers, Dalal Street,
Mumbai - 400 001.

Reference: BSE Scrip code - 500389

Sub: Submission of Annual Secretarial Compliance Report for the year ended 31st March, 2025.

Dear Sir/Madam,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report dated May 17, 2025, issued by M/s P. M Vala & Associates, Practicing Company Secretaries, for the financial year ended 31st March, 2025.

Kindly take the same on your record and oblige.

Thanking you,

Yours faithfully,

For **Silverline Technologies Limited**

CHINMAY SHRIKANT PRADHAN
Digitally signed by CHINMAY SHRIKANT PRADHAN
Date: 2025.05.29 15:02:06 +05'30'

Chinmay Pradhan
Director
DIN No- 10753724

P. M. VALA & ASSOCIATES

COMPANY SECRETARIES

Shop No.1, Laxmi Sadan CHS. Ltd., Opp. New Rose Villa,
Daji Ramchandra Road, Charai, Thane (West) - 400 601
Phone: 022-2538 0966 / Cell: 98696 99875 / 88794 10333
E-mail: rrajguroo@yahoo.co.in / pmvala@yahoo.co.in

ANNUAL SECRETARIAL COMPLIANCE REPORT OF SILVERLINE TECHNOLOGIES LIMITED (CIN: L46209MH1992PLC066360) FOR THE FINANCIAL YEAR ENDED 31ST MARCH' 2025

[Pursuant to Regulation 24A (2) read with SEBI (Listing Obligations and Disclosures Requirements) (Second Amendment) Regulations, 2021]

To,
SILVERLINE TECHNOLOGIES LIMITED
CIN L46209MH1992PLC066360
Unit no 509, 5th Floor, Centrum IT Park,
Wagle Industrial Estate, Thane (West),
Maharashtra, India, 400604

I, **Pradyumansinh M. Vala**, Proprietor of **P. M. Vala & Associates**, Company Secretaries have conducted the Secretarial Compliance Audit of the applicable SEBI (Securities and Exchange Board of India) Regulations and the circulars/guidelines issued thereunder for the Financial Year ended **31st March' 2025** for **Silverline Technologies Limited** ("the Company"). The Audit was conducted in a manner that provided me with a reasonable basis for evaluating the statutory compliances and expressing my opinion thereto.

I have examined:

(a) all the documents and records made available to me and explanation provided by **Silverline Technologies Limited** ("the Company")

(b) the filings/submission made by the Company to the stock exchanges,

(c) website of the Company

(d) any other documents/filings, as may be relevant, which has been relied upon to make this Report.

for the year ended **31st March'2025** ("Review Period") in respect of compliance with the provisions of :

P. M. VALA & ASSOCIATES COMPANY SECRETARIES FCS-5193 CP-4237 THANE

i. the Securities and Exchange Board of India Act'1992 ("SEBI Act") and the Regulations, Circulars, Guidelines issued thereunder; and

ii. the Securities Contracts (Regulation) Act'1956 ("SCRA") rule made thereunder and Regulations, Circulars, Guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The following Regulations prescribed under the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the circulars/guideline issued thereunder, have been examined:-

(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 (Depositories and Participants) Regulations, 2018; (**Not Applicable to the Company during the Audit Period)**

(d) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

(e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the Company during the Audit Period)**;

(f) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (**Not Applicable to the Company during the Audit Period)**;

(g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**Not Applicable to the Company during the Audit Period)**;

(h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (**Not Applicable to the Company during the Audit Period)**;

(i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(j) Securities and Exchange Board of India Registrars to an issue and Share Transfer Agents Regulations. 1993 regarding the Companies Act and dealing with Client:

(k) Other regulations as applicable and

Circulars/Guidelines issued thereunder;

Based on the above my examination and verification of the documents and records produced to me and accordingly to the information and explanations given to me by the Company, I report that during the Review Period :

P. M. VALA & ASSOCIATES
COMPANY SECRETARIES
FCS-5193
CP-4237
THANE

(a) The Company 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)	Deviations	Observation/Remark of the Practising Company Secretary
1	Regulation 27(2)- Corporate Governance June Quarter 2024	7 days Late Submission	Complied with the Regulation 29.07.2024 and Fine has been Paid
2	Regulation 19(1)/ 19(2)	Days of non-compliance: 92	Complied with the Regulation 18.09.2024 and Fine has been Paid

(b) The Company has maintained proper record under the provisions of the above Regulations and Circulars/Guidelines issued thereunder insofar as it appear from my examination of those records.

(c) There were no instances for actions to be taken against the Company/its promoters/directors/material subsidiaries either by SEBI or by Stock Exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulation 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	SEBI (LODR) Regulations 2015	Regulation 27(2)- Corporate Governance	Delay in Submission of Corporate Governance Report for June 2024 quarter	BSE	Fine	7 days Delay in submission of Corporate Governance Report for June 2024 Quarter	14000 Plus GST	Complied with the Regulation 29.07.2024 and Fine has been Paid	Fine has been paid	NIL
2	SEBI (LODR) Regulations	Regulation 19(1)/ 19(2)	Non Compliance with	BSE	Fine	Non-compliance with	1,84,000 plus GST	All the members of the Nominati	Fine has been paid	NIL

M. VALA & ASSOCIATES
COMPANY SECRETARIES
FCS-5193
CP-4237
THANE

	2015		the constitution of Nomination and Remuneration Committee (NRC) for December 2024 Quarter			the requirements pertaining to the composition of the Board of Directors, during the quarter ended 2024 Quarter. Days of non-compliance: 92		on and Remuneration Committee are non-executive director and two third Independent Director during the period from 01/10/2024 to 31/12/2024 Company has complied with the requirements of regulation 19 (1) of LODR w.e.f.18.09.2024 by reconstituting Nomination and Remuneration Committee by inducting Independent Director as Chairperson		

P. M. VALA & ASSOCIATES
COMPANY SECRETARIES
FCS-5193
CP-4237
THANE

(d) The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable:

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

(e) Additional affirmations:

Based on the above my examination and verification of the documents and records, and pursuant to Circular Ref. No. NSE/CML/ 2023/21 dated March I6, 2023 issued by National Stock Exchange of India Limited and Notice No. 20230316-14 dated March 16, 2023 issued by BSE Limited, I hereby report that, the during the Review period the compliance status of the listed entity is appended as below:

Sr. No	Particulars	Compliance Status (Yes/ No/ NA)	Observation / Remarks by PCS
1	**Secretarial Standard:** The compliances of the Listed Entity are in accordance with the 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	The Listed Entity has duly **complied** with all the applicable secretarial standards under Companies Act, 2013
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**	Yes Yes	The Listed Entity has updated applicable policies under SEBI Regulations and the same are in conformity with SEBI Regulations and has been reviewed.

P. M. VALA & ASSOCIATES
COMPANY SECRETARIES
FCS-5193
CP-4237
THANE

	as per the regulations / circulars / guidelines issued by SEBI.		
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 redirects to the relevant document(s) section of the website.	Yes Yes Yes	The Listed Entity has maintained and disclose all the required details on Website **https://www.silverlinetechnology.com/** as per Regulation 46 of SEBI (LODR), 2015.
4	**Disqualification of Director:** None of the Director of the Company are disqualified under Section - 164 of Companies Act, 2013	Yes	**None of the Director of the Listed Entity** are disqualified under Section 164 of Companies Act, 2013.
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 Yes	The Listed Entity does not have any subsidiary company None

P. M. VALA & ASSOCIATES
COMPANY SECRETARIES
FCS-5193
CP-4237
THANE

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	The Listed Entity has **maintained** proper records of all the documents as prescribed under SEBI Regulations
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	The Listed Entity has duly conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year.
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 N.A.	The Listed Entity has obtained prior approval of Audit Committee for all Related Party transactions except as provided in clause (b). N.A.
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 there under.	Yes	The Listed Entity has complied with the requirement of Disclosure and Information under Regulation 30 of SEBI (LODR), 2015
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 Listed Entity has duly complied with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.

P. M. VALA & ASSOCIATES
COMPANY SECRETARIES
FCS-5193
CP-4237
THANE

11	**Actions taken by SEBI or Stock Exchange(s), if any:** No Actions 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.	Yes	The Company is not in receipt of any Such notices from SEBI or Stock Exchange (including under the Standard Operating Procedures issued by SEBI Various through Circulars) under SEBI Regulations and Circulars / Guidelines issued thereunder.
12	**Resignation of statutory auditors from the listed entity or its material subsidiaries:** In case of resignation of statutory auditor from the listed There were no entity or any of its material subsidiaries during the financial NA such transactions year, the listed entity and/ or its material subsidiary(ies) has/have during the review complied with paragraph 6.1 and 6.2 of section V-D period. of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	There were no such transactions during the review period
13	**Structural Digital Database (SDD) Compliance** If the Company is non-compliant with SDD requirement the Company needs to submit quarterly compliance certificate certified by Practicing Company Secretary till the time	YES	The Company is SDD Compliant
14	Additional Non-Compliances, if any: No any Additional Non-Compliance observed for all SEBI Regulation/Circular/ Guidance Note etc.	NA	NA



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

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks by PCS
1	1. 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 2. 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 as well as the next quarter; or 3. 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	Not Applicable	NIL
2	Other conditions relating to resignation of statutory auditor 1. Reporting of concerns by Auditor with respect to the Listed Entity/its material subsidiary to the Audit Committee: a. 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	Not Applicable	No such resignation

P. M. VALA & ASSOCIATES COMPANY SECRETARIES FCS-5193 CP-4237 THANE

	receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings. b. 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 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. c. 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. 2. Disclaimer in case of non-receipt of information: 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 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	No such resignation

P. M. VALA & ASSOCIATES
COMPANY SECRETARIES
FCS-5193
CP-4237
THANE

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. My responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.

3. I have not verified the correctness and appropriateness of financial records and books of account of the listed entity.

4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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 P. M. Vala & Associates,
Company Secretaries



P. M. Vala
(Proprietor)
FCS No.5193, COP No.4237
ICSI Unique Code: I2001MH250600
Peer Review No.1884/2022
UDIN: F005193G000486841

Place: **Thane**
Date: **29th May'2025**