Date: July 28, 2026

To

The General Manager
Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai – 400001
(Scrip Code: 543435)

Dear Sir/Madam,

Sub: Submission of Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with the applicable SEBI Circular(s), please find enclosed herewith the **Annual Secretarial Compliance Report** of **Clara Industries Limited** for the financial year ended **31st March, 2026**, issued by **CS Ashish Verma, Practicing Company Secretary**.

Kindly take the above on record and acknowledge the receipt.

Thanking You,

Yours faithfully,

For Clara Industries Limited

POOJA Digitally signed by POOJA Date: 2026.07.28 15:07:23 +05'30'

Pooja
Company Secretary & Compliance Officer
Membership Number: A36167

Encl.: Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2026.

CLARA INDUSTRIES LIMITED
CIN :- L25209UP2021PLC151537
Regd Office :- 127/1, Gram Simbhalka Junardar, Paragana, Tehsil and District Saharanpur. Pincode :- 247001
Uttar Pradesh, India.
Phone :- +91 8171884399, 011-69656854. Email :- info@clara.co.in, cs@clara.co.in Website :- www.clara.co.in

VERMA ASHISH & CO(PEER REVIEWED FIRM)
CS ASHISH VERMA (prop)
RO: 1/5142 Rampuri Colony, Ground Floor , Nehru Nagar, Near Hanuman Mandir
Saharanpur 247001
EMAIL: info@vermaashish.in, csvermaashish@gmail.com,
+91-9259052740, 9897062740, 9918189399

SECRETARIAL COMPLIANCE REPORT
OF
CLARA INDUSTRIES LIMITED
(CIN: L28999DL2021PLC379748)

For the Financial Year ended 31st March, 2026

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **CLARA INDUSTRIES LIMITED** ("the listed entity") for the financial year ended **31st March, 2026**.

The review has been conducted in a manner that provided us a reasonable basis for evaluating the corporate conduct/statutory compliances and expressing our opinion thereon.

We, **Verma Ashish & Co, Company Secretaries**, have examined:

(a) all the documents and records made available to us and explanation provided by **CLARA INDUSTRIES LIMITED** ("the listed entity");

(b) the filings/submissions made by the listed entity to the stock exchange(s);

(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 financial year ended **31st March, 2026** ("Review Period") in respect of compliance with the provisions of:

(a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars and guidelines issued thereunder; and

(b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars and 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:

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C.P. 22530
M.No.-59867
COMPANY SECRETARY

(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 (Buy-back of Securities) Regulations, 2018; **Not Applicable during the Review Period**;

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

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable during the Review Period**;

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

(h) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **Not Applicable during the Review Period**;

(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

and the circulars/guidelines issued thereunder.

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We hereby report that, during the Review Period, the compliance status of the listed entity with the following requirements is appended below:

Sl. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS
1	**Secretarial Standards:** 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**	NIL
2	**Adoption and timely updation of the Policies:** (a) All applicable policies under SEBI Regulations are adopted with the approval of the Board of Directors. (b) All the policies are in conformity with SEBI Regulations and have been reviewed and updated within the prescribed timelines.	**YES**	NIL
3	**Maintenance and disclosures on Website:** (a) The listed entity maintains a functional website. (b) Timely dissemination of documents/information under a separate section on the website. (c) Web-links provided in Annual Report are accurate and specific.	**YES**	NIL
4	**Disqualification of Director:** None of the Directors of the Company is disqualified under Section 164 of the Companies Act, 2013.	**YES**	NIL
5	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	**N.A.**	The Company does not have any subsidiary during the Review Period.
6	**Preservation of Documents:** The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records is carried out in accordance with the applicable policy.	**YES**	NIL
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7	**Performance Evaluation:** The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the commencement of every financial year / during the financial year as prescribed in SEBI Regulations.	**YES**	NIL
8	**Related Party Transactions:** (a) The listed entity has obtained prior approval of the Audit Committee for all Related Party Transactions; or (b) where prior approval was not obtained, the listed entity has provided detailed reasons along with subsequent approval/ratification by the Audit Committee, wherever applicable.	**YES**	NIL
9	**Disclosure of Events or Information:** The listed entity has provided all the required disclosures under Regulation 30 read with Schedule III of the SEBI (LODR) Regulations, 2015 within the prescribed timelines.	**YES**	NIL
10	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) and 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.	**YES**	NIL
11	**Actions taken by SEBI or Stock Exchange(s), if any:** No action(s) has/have been taken against the listed entity/its promoters/directors/subsidiaries either by SEBI or by the Stock Exchange(s), including under the SEBI Standard Operating Procedures issued through various circulars.	**N.A.**	No action was taken by SEBI or BSE against the Company, its promoters or directors during the Review Period.
12	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI Regulation/Circular/Guidance Note etc.	**N.A.**	No additional non-compliance was observed during the Review Period.

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Compliance relating to resignation of Statutory Auditor from the listed entity and its material subsidiary(ies) as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019: **NOT APPLICABLE.**

Sl. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS
1.	**Compliances with the following conditions while appointing/re-appointing an auditor:**(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(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(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. VERMA ASHISH & CO. CS C.P. 22530 M.No.-59867 COMPANY SECRETARY	**N.A.**	**The Statutory Auditor of the Company did not resign during the Review Period. Hence, the above provisions are not applicable.**

2	**Other conditions relating to resignation of Statutory Auditor**	**N.A.**	**The Statutory Auditor of the Company did not resign during the Review Period. Accordingly, the requirements of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18 October 2019 are not applicable.**
3	**The listed entity and/or its material subsidiary has obtained information from the Auditor upon resignation, in the format specified in Annexure-A of SEBI Circular CIR/CFD/CMD1/114/2019 dated 18 October 2019.**	**N.A.**	**No resignation of the Statutory Auditor occurred during the Review Period. Hence, this requirement is not applicable.**

(a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of the matters specified below:

Compliance Requirement (Regulations/Circulars/Guidelines including specific clause)	**Regulation/Circular No.**	**Deviation**	**Action Taken by**	**Type of Action**	**Details of Violation**	**Fine Amount**	**Observations/Remarks of PCS**	**Management Response**	**Remarks**
NIL	**NIL**	**NIL**	**NIL**	**NIL**	**NIL**	**NIL**	**NIL**	**NIL**	**NIL**

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

Compliance Requirement (Regulations/Circulars/Guidelines including specific clause)	Regulation/Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of PCS	Management Response	Remarks
NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

(Note):

1. *Provide the list of all the observations in the report for the previous financial year along with the actions taken by the listed entity on those observations.*
2. *Add the list of all observations in the reports pertaining to the periods prior to the previous financial year in case the listed entity has not taken sufficient steps to address the concerns raised/observations.*

E.g. *In the report for the financial year ended **31st March, 2026**, the PCS should provide a list of:*

• *all the observations in the report for the year ended **31st March, 2026** along with the actions taken by the listed entity on those observations;*
• *the observations in the reports pertaining to the year ended **31st March, 2026** and earlier, in case the listed entity has not taken sufficient steps to address the concerns raised/observations in those reports.*

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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 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 (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, 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 Verma Ashish & Co
Company Secretaries

VERMA ASHISH & CO.
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C.P. 22530
M.No.-59867
COMPANY SECRETARY

CS Ashish Verma
Proprietor
Membership No.: ACS 59867
Certificate of Practice No.: 22530
Peer Review Certificate No.: 2331/2022

UDIN: A059867H001036062

Place: Saharanpur, Uttar Pradesh
Date: 28 July, 2026