

HARIG CRANKSHAFTS LIMITED

CIN: L68200UP1983PLC026603, 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; GSTIN: 09AAACH1275R2Z2, Phone no.9818105480

May 30, 2026

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

BSE Scrip Code: 500178

Subject:-Annual Secretarial Compliance Report for the financial year ended March 31, 2026

Dear Sir/Ma'am,

Pursuant to Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Annual Secretarial Compliance Report of the Company for the Financial Year Ended March 31, 2026, duly 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,

For Harig Crankshafts Limited

Ayushi Gupta
Company Secretary & Compliance Officer

Encl: as above

R & D

COMPANY SECRETARIES

Annual Secretarial Compliance Report of Harig Crankshafts Limited for the financial year ended 31st March 2026

(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 31st March 2026, 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 31st March 2026, 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	Observation s/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	The listed entity shall comply with the minimum public shareholding requirements specified in Rule 19(2) and Rule 19A of the Securities Contracts (Regulation) Rules, 1957	Regulation 38 of the SEBI (Listing Obligations and Disclosure Requirements), 2015	The Company was not in compliance with Regulation 38 of the SEBI (LODR) Regulations, 2015 read with Rules 19(2) and 19A of the Securities Contracts (Regulation) Rules, 1957, as it failed to maintain the minimum public shareholding during the period under review.	Levied fine from 14.07.2025 till 03.10.2025	Levied fine from 14.07.2025 till 03.10.2025	The Company was not in compliance with Regulation 38 of the SEBI (LODR) Regulations, 2015 read with Rules 19(2) and 19A of the Securities Contracts (Regulation) Rules, 1957, as it failed to maintain the prescribed minimum public shareholding during the period under review.	Rs.4,83,800	The Company was not in compliance with Regulation 38 of the SEBI (LODR) Regulations, 2015 read with Rules 19(2) and 19A of the Securities Contracts (Regulation) Rules, 1957, as it failed to maintain the prescribed minimum public shareholding during the period under review. Due days i.e. until	The Company has received the Revocation approval and approvals from BSE vide letter dated 01.07.2025 and 02.07.2025 respectively. The Trading in the Company's shares commenced with effect from 09.07.2025. The Company only got a period of 5 days i.e. until	The Company has received the Revocation approval and approvals from BSE vide letter dated 14.10.2025



(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 st March, 2025 (the years are to be mentioned)	Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the PCS on the actions taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	The Company has appointed Mr Manoj Agarwal, Ms Pragma Agarwal, Mr Lalit Kumar and Mr Rajveer Singh on 17th 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 Lalit Kumar and Mr Rajveer Singh on 17th May, 2024. However, their appointment were not approved by the shareholders within 3 months.	Regulation 17(1C)(a) of SEBI (Listing Obligations and Disclosures Requirements), 2015 ("SEBI Listing Regulations, 2015") (LODR Regulations)	The Company has appointed Mr Manoj Agarwal, Ms Pragma Agarwal, Mr Lalit Kumar and Mr Rajveer Singh on 17th May, 2024. However, their appointment were not approved by the shareholders within 3 months.	Pursuant to the NCLT Approved Resolution submitted by Management, The new board of Directors were appointed on 17th May 2024. However, since the company was not in operation since 2011, various post CIRP challenges the delay in restructuring activities undertaken by the Company, the delay appears to be procedural in nature. Nevertheless, the shareholdes' EGM/AGM within the prescribed period. The approval for the allotment and appointment of	The explanation provided by the Management has been noted. Considering the exceptional circumstances arising out of the implementation of the NCLT-approved Resolution Plan and the post-CIRP restructuring activities undertaken by the Company, the delay appears to be procedural in nature. Nevertheless, the shareholdes' EGM/AGM within the prescribed period. The approval for the allotment and appointment of



					reduction of shares is being done by Director on 15 th July, 2024, However, the corporate actions of the same is being carried out by approved by CDSL/NSDL in the month of November, 2024. However the same is being approved in the Annual General meeting of the company held on 30 th December, 2024.	Directors was not obtained within the statutory timeline prescribed under the Companies Act, 2013. The appointments subsequently approved by the shareholders at the Annual General Meeting held on 30 th December, 2024. Accordingly, the non-compliance was regularized with effect from the date of such approval.
2.	The Company has appointed Mr Manoj Agarwal as Managing Director on 17th May, 2024. However, their appointment were not approved by the shareholders within 3 months.	The Company has appointed Mr Manoj Agarwal as Managing Director on 17th May, 2024. However, their appointment were not approved by the shareholders within 3 months.	Regulation 17(1C)(a) of SEBI (Listing Obligations and Disclosures) Regulations, 2015 (SEBI LODR Regulations)	The Company has appointed Manoj Agarwal as Managing Director on 17th May, 2024. However, their appointment were approved by the shareholders within 3 months.	Mr. Manoj Agarwal has appointed Manoj Agarwal as Managing Director. However, since the company was not in operation since 2011, various post CIRP transitional challenges in operationalizing statutory certain functions due to the company could not hold the	The explanation provided by Management has been noted. Considering the exceptional circumstances arising out of the implementation of the NCLT-approved Resolution Plan and the post-CIRP restructuring activities undertaken by the Company, the



3.	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	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	Regulation 33(3)(a) of SEBI (Listing Obligations and Disclosure 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 the meeting	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	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	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	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	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	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	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	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	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	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



February, 2025	held on 14th February, 2025	meeting held on 14th February, 2025	in appointment of Statutory Auditors, has been noted. While these circumstances may have contributed to the delay, the requirement under Regulation 33 of the SEBI (LODR) Regulations, 2015 to approve and submit the quarterly financial results within the prescribed timelines remained applicable. Consequently, the Company was not compliant with the prescribed timelines for the financial results pertaining to the quarter and year-to-date periods ended 30th June, 2024 and 30th September, 2024. The financial results were subsequently approved by the Board on 14th February, 2025 and disclosed thereafter.
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4.	<p>The Company has approved its annual financial results for the financial year ended 31st March, 2024 beyond 60 days i.e. in the meeting held on 6th December, 2024</p>	<p>The Company has approved its annual financial results for the financial year ended 31st March, 2024 beyond 60 days i.e. in the meeting held on 6th December, 2024</p>	<p>Regulation 33(3)(a) of SEBI (Listing Obligations and Disclosures) Regulations, 2015 ("SEBI LODR Regulations")</p>	<p>Due to a recent change in management and the delay due to non-availability of financial Statements for the previous years, the Company, which has impacted our ability to appoint an auditor in a timely manner.</p>	<p>The Management's explanation regarding the change in management and the delay due to change in management and non-availability of historical financial records has been noted. However, the Annual Audited Financial Results for the financial year ended 31st March, 2024 were approved by the Board on 6th December, 2024, beyond the timeline prescribed under Regulation 33 of the SEBI (LODR) Regulations, 2015. Accordingly, the Company was not in compliance with the said Regulation during the relevant period. The financial results were subsequently approved and disclosed by the Company.</p>
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<p>5. The Company has not filed the statement for the quarter ended 31st March, 2024</p>	<p>The Company has not filed the statement for the quarter ended 31st March, 2024</p>	<p>Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requirements, 2015 ("SEBI LODR Regulations)</p>	<p>The Company has not filed the statement for the quarter ended 31st March, 2024</p>	<p>Pursuant to the Approved Resolution submitted by the Board of Directors appointed on 17.05.2024 is being responsible for the prospective quarters/ Resolution Plan, the yearly compliances, statement for the the captioned data quarter ended 31st March, 2024 was not filed within the prescribed timeline and accordingly the Company was not compliant with the applicable provisions of the SEBI (LODR) Regulations, 2015 for the relevant period.</p>	<p>The explanation provided by Management has been noted. However, being irrespective of the change in management to the Pursuant to the Approved Resolution submitted by the Board of Directors appointed on 17.05.2024 is being responsible for the prospective quarters/ Resolution Plan, the yearly compliances, statement for the the captioned data quarter ended 31st March, 2024 was not filed within the prescribed timeline and accordingly the Company was not compliant with the applicable provisions of the SEBI (LODR) Regulations, 2015 for the relevant period.</p>
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<p>6. The Company has not filed the Corporate Governance report for the quarter ended 31st March, 2024</p>	<p>The Company has not filed the Corporate Governance report for the quarter ended 31st March, 2024</p>	<p>Regulation 27(2) of SEBI (Listing Obligations and Disclosure Requirements), 2015 ("SEBI LODR Regulations)</p>	<p>The Company has not filed the Corporate Governance report for the quarter ended 31st March, 2024</p>	<p>Pursuant to the NCLT Approved Resolution Plan submitted by Management Palika,, The Board of Directors being appointed on 17.05.2024 is responsible for the prospective quarters/ Resolution Plan, the yearly compliances, statement for the the captioned data quarter ended 31st March, 2024 was not filed within the prescribed timeline and accordingly the Company was not compliant with the applicable provisions of the SEBI (LODR) Regulations, 2015 for the relevant period.</p>	<p>The explanation provided by Management has been noted. However, irrespective of the change in management to the Resolution Plan, the statement for the quarter ended 31st March, 2024 was not filed within the prescribed timeline and accordingly the Company was not compliant with the applicable provisions of the SEBI (LODR) Regulations, 2015 for the relevant period.</p>
<p>7. The Company has not filed the Shareholding pattern for the quarter ended 30th June, 2024 within 21 days from the end of quarter</p>	<p>The Company has not filed the Shareholding pattern for the quarter ended 31st March, 2024 and 30th June, 2024 within 21 days from the end of quarter</p>	<p>Regulation 31(1) of SEBI (Listing Obligations and Disclosure Requirements), 2015 ("SEBI LODR Regulations)</p>	<p>The Company has not filed the Shareholding pattern for the quarter ended 31st March, 2024 and 30th June, 2024 within 21 days from the end of quarter</p>	<p>Pursuant to the NCLT Approved Resolution Plan submitted by Management Palika, The Board of Directors being appointed on 17.05.2024 is responsible for the prospective quarters/ filed and the yearly compliances, Shareholding Pattern the captioned data for the quarter ended 30th June, 2024 was</p>	<p>The explanation provided by Management has been noted. However, the Shareholding Pattern for the quarter ended 31st March, 2024 was not filed and the Shareholding Pattern for the quarter ended 30th June, 2024 was</p>



<p>filed the Related party transaction for the half year ended 30th September, 2024</p>	<p>filed the Related party transaction for the half year ended 30th September, 2024</p>	<p>(Listing Obligations and Disclosure Requirements, 2015 ("SEBI LODR Regulations))</p>	<p>change in the explanation regarding and the delay arising from of the recent change in management, non-availability of the previous years availability of the Company and historical financial records, and other post-CIRP transitional challenges, which has impacted our ability to provide the same.</p>	<p>the explanation regarding and the delay arising from of the recent change in management, non-availability of the previous years availability of the Company and historical financial records, and other post-CIRP transitional challenges, which has impacted our ability to provide the same. Party Transactions for the half year ended 30th September, 2024 was not filed within the timeline prescribed under Regulation 23(9) of the SEBI (LODR) Regulations, 2015. Accordingly, the Company was not in compliance with the said Regulation during the relevant period.</p>
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(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.	<p>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).</p>	Yes	The Company has complied the Secretarial Standards 1 and 2.
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> ● 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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	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.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> ● 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 Yes Yes	We have examined that the Company is maintaining the website from the financial year 2024.



4.	Disqualification of Director: 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.	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	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.	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 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.	Performance Evaluation: 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.	Related Party Transactions: (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.	Yes Yes	The Company had obtained prior approval of the Audit Committee for all Related Party Transactions, except certain transactions relating to loans received from Directors and reimbursement of expenses, which were subsequently ratified by the Audit Committee at its meeting held on 29 May 2025.



9.	<p>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 thereunder.</p>	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.	<p>Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any: 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 (**).</p>	Yes	The Company was not in compliance with Regulation 38 of the SEBI (LODR) Regulations, 2015 read with Rules 19(2) and 19A of the Securities Contracts (Regulation) Rules, 1957, as it failed to maintain the prescribed minimum public shareholding during the period under review. Due to the non-compliance the BSE Ltd has initiated freezing action has been initiated against the Promoters and Promoter Group of the Company on 21.08.2025



12.	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries: 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.</p>	N/A	There was no resignation of statutory auditors from the Company or its material subsidiary
13.	<p>Additional non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.</p>	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: F007775H000554761

**Date: 30th May, 2026
Place: Delhi**

