Annexure- E

SECRETARIAL COMPLIANCE REPORT
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2024
[Pursuant Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

The Members,
Gala Global Products Limited
Ahmedabad – 380 021

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Gala Global Products Limited** having its Registered Office at B-1, Laxmi Com. Co. Op. Estate, B/H Old Navneet Press, Sukhramnagar, Ahmedabad 380021. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion 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 in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2024, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined:

a) all the documents and records made available to me and explanation provided by Gala Global Products 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 March 31, 2024 ("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; *Not Applicable as no securities were bought back during the term under review*
e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *Not Applicable as no such scheme was introduced for Employees*
f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *Not Applicable as no Debt securities are listed or issued by the Company*
g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; *Not Applicable as no such securities are listed or issued by the Company*
h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, regarding the Companies Act and dealing with client;
j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; *Not applicable for the review period*
k) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

And based on the above examination and confirmation received from management of the Company as and wherever required, 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.	**Secretarial Standards**: 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.	No	As provided in point no 3 of Table (a) of this report
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 have been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.	Yes	-
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	Yes	-

	document(s)/ section of the website.		
4.	**Disqualification of Director:** None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	-
5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** • Identification of material subsidiary companies • Requirements with respect to disclosure of material as well as other subsidiaries	NA	The Company do not have any subsidiaries.
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	-
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	-
8.	**Related Party Transactions:** • The listed entity has obtained prior approval of Audit Committee for all related party transactions. • 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	-
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 thereunder.	Yes	Except as mentioned in Table (a) of the this report
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	-
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	No	As provided in Table (a) of said

	Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.		report
12.	**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 read with CIR/CFD/CMD1/114/2019 dated October 18, 2019.	NA	The Statutory Auditor has not resigned during the financial year.
13.	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	-

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 (Table a): -

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/Fine/Show Cause Notice/Warning, etc.)	Fine Amount	Observations/ Remarks of Practicing Company Secretary	Management Response
5.	Shareholding Pattern - Regulation 31(1)(b) of SEBI (LODR) Regulatio	Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015	There was a delay in filing of Shareholding Pattern for the	BSE	Fine	Rs. 40,120/- Including GST.	The said delay was caused due to non-receipt of reports from the RTA of the Company due to payment dispute.	The company has duly paid Penalty of Rs. 40,120/- and compliance officer will

	ns, 2015.		quarter ended June 2023 by 18 days.					ensure timely filing to the Exchange in future.
6.	Reconciliation of share capital audit report - Regulation 76 of SEBI (Depositories and Participants) Regulation, 2018	Regulation 76 of SEBI (Depositories and Participants) Regulation, 2018	There was delay in filing of Reconciliation of share capital audit report for the quarter ended June 2023 by 9 days.	NA	NA	NA	The said delay was caused due to non-receipt of reports from the RTA of the Company due to payment dispute.	Compliance Officer will ensure timely filing to the Exchange in future.
7.	Annual Report and Notice of 13th Annual General Meeting for FY 22-23 - Regulation 36 of SEBI (LODR) Regulations, 2015	Regulation 36 of SEBI (LODR) Regulations, 2015	There was delay in giving Annual Report and notice of 13thAnnual General Meeting for FY 22-23 to shareholders by 6 days.	NA	NA	NA	There was delay in giving Annual Report and notice of 13th Annual General Meeting for FY 22-23 by 6 days due to non-receipt of financials from the Statutory Auditors of the Company.	Compliance Officer will ensure timely filing to the Exchange in future.
8.	Annual Listing Fees for the F.Y.	In Accordance with the Listing	Non – payment of Annual	BSE	Interest levied	NA	The company has not paid Annual Listing Fees for FY 2023-24 due to	The Company has duly paid said

	2023-24	Agreement with Exchange.	Listing Fees for the F.Y. 2023-24				administrative reasons.	Fees at a later date along with Interest. The abundant Precaution will be taken for timely payment to the Exchanges.

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

Sr. No.	**Ramark**	**Regulation /Circular No.**	**Deviations**	**Action Taken by**	**Type of Action (Advisory/Clarification/Fine/Show Cause Notice/Warning, etc.)**	**Fine Amount**	**Observations/ Remarks of Practicing Company Secretary**	**Management Response**
1.	Prior Intimation of Board Meeting Regulation 29(2) of SEBI (LODR) Regulations, 2015.	Regulation 29(2) of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015	Delay in filing of Prior Intimation of Board Meeting held for the Financial Result for the Quarter ended June	NA	NA	NA	There was delay in filing of Prior Intimation of Board Meeting held for the Financial Result for the Quarter ended June 30, 2022	The abundant Precaution will be taken for timely intimation to the Exchanges.

			30, 2022					
2.	Intimation of Resignation of Statutory Auditor Regulation 30 of SEBI (LODR) Regulations, 2015.	Regulation 30 of SEBI (LODR) Regulations, 2015	Delay in filing of Intimation with Exchange for Resignation of M/s. Shah Karia & Associates, Statutory Auditor of the Company	NA	NA	NA	The Intimation of Resignation of Statutory Auditor was filed with delay of 14 Days.	The abundant Precaution will be taken for timely intimation to the Exchanges.
3.	Outcome of Board Meeting Regulation 30 of SEBI (LODR) Regulations, 2015.	Regulation 30 of SEBI (LODR) Regulations, 2015	Delay in filing of Outcome of Board Meeting held on July 30, 2022 for Appointment of Statutory Auditors of the Company.	NA	NA	NA	The outcome of Board Meeting held on July 30, 2022 for Appointment of Statutory Auditor of the Company was filed with delay of 14 Days.	The abundant Precaution will be taken for timely intimation to the Exchanges.

4.	Composition of Board of Directors Regulation 17(1) of SEBI (LODR) Regulations, 2015.	Regulation 17(1) of SEBI (LODR) Regulations, 2015	Non Compliance with the requirements pertaining to the composition of the Board for the Quarter ended on December 31, 2022 and March 31, 2023.	BSE	Fine	Rs. 377600/- Including GST and Rs. 236000/- Including GST	There was Noncompliance with the requirements pertaining to the composition of the Board. The Fine amount is paid by the company.	Due to sudden resignation by the Directors of the Company. The Company was in process for Appointment of eligible director who can contribute to the growth of the Company. Further, the Company has duly appointed the Director to comply the said regulations.
5.	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer Regulation 6(1) of SEBI (LODR) Regulations, 2015.	Regulation 6(1) of SEBI (LODR) Regulations, 2015.	Noncompliance with requirement to appoint a qualified company secretary as the compliance officer	BSE	Fine	Rs. 21240 /- Including GST	The Company has appointed Ms. Chhayaben Mulani, Company Secretary and Compliance Officer with a delay of 18 days.	The Company has duly appointed Ms. Chhayaben Mulani, Company Secretary and Compliance Officer. The abundant Precaution will be taken for timely compliance with the Regulations.
6.	Intimation of resignation of Independ	Regulation 30 of SEBI (LODR) Regulations, 2015.	Delay in Intimation of resign	BSE	Clarification	NA	There was a delay in Intimation of resignation of Ms. Yesha	The intimation was delayed without any malafide intention and

	ent Director of the Company Regulation 30 of SEBI (LODR) Regulations, 2015.		ation of Independent Director of the Company				Bhatt and Ms. Stutiben Kinariwala as an Independent Directors of the Company.	ulterior motive on part of the company. The Company has provided clarification with respect to said noncompliance to the BSE.

Assumptions & Limitation of scope and Review:

Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.

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

We have not verified the correctness and appropriateness of Financial Records and Books of Accounts of the listed entity.

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.

For Deepti & Associates
Practicing Company Secretaries

Sd/-
Deepti Grover
Proprietor
FCS. No. 7654 | C.P.: 17546
FRN: S2016DE438900 **May 27, 2024**
UDIN: F007654F000457950 **New Delhi**