Annexure- E

SECRETARIAL COMPLIANCE REPORT
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2025
[Pursuant Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

Annual Secretarial Compliance Report of
Gala Global Products Limited
(CIN: L29109GJ2010PLC063243)
For the Financial Year ended March 31, 2025

The Members,
Gala Global Products Limited
B-1, Laxmi Com. Co. Op. Estate,
B/H Old Navneet Press, Sukhramnagar,
Ahmedabad, Gujarat, India, 380021

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, 2025, 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, 2025 ("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; *Not Applicable as no securities issued during the term under review*
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 and Sweat Equity) Regulations, 2021; *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:

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**

12.	Shareholding Pattern - Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015.	Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015	There was a delay in filing of Shareholding Pattern for the quarter ended June 2024 by 190 days.	BSE	Fine	Rs. 3,80,000/- and GST	There was a delay of 190 days in filing of Shareholding Pattern for the quarter ended June 2024 by 190 days.	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. 78,000/- and for balance amount the company will file waiver application as the same was occurred due to dispute with RTA.
13.	Reconciliation of share capital audit report -	Regulation 76 of SEBI (Depositories and	There was delay in filing of Reconciliation of	NA	NA	NA	There was delay of 203 days in filing of	The said delay was caused due to non-

	Regulation 76 of SEBI (Depositories and Participants) Regulation, 2018	Participants) Regulation, 2018	share capital audit report for the quarter ended June 2024 by 203 days.				Reconciliation of share capital audit report for the quarter ended June 2024.	receipt of reports from the RTA of the Company due to payment dispute. Compliance Officer will ensure timely filing to the Exchange in future.
14.	Newspaper Advertisement - Regulation 47 of SEBI (LODR) Regulations, 2015	Regulation 47 of SEBI (LODR) Regulations, 2015	There was delay in publication of Unaudited Financial Results (Standalone) for the Quarter ended June, 2024 in Newspaper by 1 day.	NA	NA	NA	There was delay of 1 day in publication of Unaudited Financial Results (Standalone) for the Quarter ended June, 2024.	The said delay was caused due to National holiday for Independence Day.
15.	Annual Report and Notice of 14th Annual General	Regulation 34 & 36 of SEBI (LODR) Regulations,	There was delay in giving Annual Report and	NA	NA	NA	There was delay of 19 days in giving Annual Report	There was delay in giving Annual Report and

	Meeting for FY 2023-24 - Regulation 34 & 36 of SEBI (LODR) Regulations, 2015	2015	notice of 14th Annual General Meeting for FY 2023-24 to shareholders by 19 days.				and notice of 14th Annual General Meeting for FY 2023-24 to shareholders.	notice of 14th Annual General Meeting for FY 2023-24 by 19 days due to non-receipt of financials from the Statutory Auditors of the Company.
16.	Shareholding Pattern - Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015.	Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015	There was a delay in filing of Shareholding Pattern for the quarter ended September, 2024 by 2 days.	BSE	Fine	Rs. 4,000/- and GST	There was a delay of 2 days in filing of Shareholding Pattern for the quarter ended September, 2024.	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.
17.	Corporate Governance Report -	Regulation 27(2) of SEBI	There was a delay in filing of	BSE	Fine	Rs. 42,000/- and	There was a delay of 21 days	The said delay was caused

	Regulation 27(2) of SEBI (LODR) Regulations, 2015.	(LODR) Regulations, 2015	Corporate Governance Report for the quarter ended September, 2024 by 21 days.			GST	in filing of Corporate Governance Report for the quarter ended September, 2024.	due to non-receipt of Details of Related Party Transactions from the Statutory Auditors of the Company. The company has duly paid Penalty.
18.	Statement of Grievance Redressal Mechanism - Regulation 13(3) of SEBI (LODR) Regulations, 2015.	Regulation 13(3) of SEBI (LODR) Regulations, 2015	There was a delay in filing of Statement of Grievance Redressal Mechanism for the quarter ended September, 2024 by 9 days.	BSE	Fine	Rs. 9,000/- and GST	There was a delay of 9 days in filing of Statement of Grievance Redressal Mechanism for the quarter ended September, 2024.	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.
19.	Certificate received from	Regulation 74(5) of	There was a delay in	NA	NA	NA	There was a delay of	The said delay was

	Registrar and Share Transfer Agent - Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018.	SEBI (Depositories and Participants) Regulations, 2018	filing of Certificate received from Registrar and Share Transfer Agent for the quarter ended September, 2024 by 15 days.				15 days in filing of Certificate received from Registrar and Share Transfer Agent for the quarter ended September, 2024.	caused due to non-receipt of reports from the RTA of the Company due to payment dispute.
20.	Shareholding Pattern - Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015.	Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015	There was a delay in filing of Shareholding Pattern for the quarter ended December, 2024 by 4 days.	NA	NA	NA	There was a delay of 4 days in filing of Shareholding Pattern for the quarter ended December, 2024.	The said delay was caused due to non-receipt of reports from the RTA of the Company due to payment dispute.
21.	Certificate received from Registrar and Share Transfer Agent - Regulation 74(5) of SEBI (Depositories and Participan	Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018	There was a delay in filing of Certificate received from Registrar and Share Transfer Agent for the	NA	NA	NA	There was a delay of 5 days in filing of Certificate received from Registrar and Share Transfer Agent	The said delay was caused due to non-receipt of reports from the RTA of the Company due to

	ts) Regulations, 2018.		quarter ended December, 2024 by 5 days.				for the quarter ended December, 2024.	payment dispute.
22.	Prior Intimation of Board Meeting - Regulation 29 of SEBI (LODR) Regulations, 2015	Regulation 29 of SEBI (LODR) Regulations, 2015	There was omission of Prior Intimation of Board Meeting dated October 21, 2024 for Approval for Right Issue.	NA	NA	NA	There was omission of Prior Intimation of Board Meeting dated October 21, 2024 for Approval for Right Issue.	There was an unintentional omission in filing of prior intimation of Board Meeting. Compliance Officer will ensure timely filing to the Exchange in future.

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

Sr. No.	**Compliance Requirement (Regulations/ circulars/ guidelines including specific**	**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**

	clause)							
1.	Shareholding Pattern - Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015.	Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015	There was a delay in filing of Shareholding Pattern for the quarter ended June 2023 by 18 days.	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 ensure timely filing to the Exchange in future.
2.	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.
3.	Annual Report and Notice of 13th Annual General Meeting for FY 22-23 -	Regulation 36 of SEBI (LODR) Regulations, 2015	There was delay in giving Annual Report and notice of 13thAnnual	NA	NA	NA	There was delay in giving Annual Report and notice of 13th Annual	Compliance Officer will ensure timely filing to the Exchange in

	Regulation 36 of SEBI (LODR) Regulations, 2015		General Meeting for FY 22-23 to shareholders by 6 days.				General Meeting for FY 22-23 by 6 days due to non-receipt of financials from the Statutory Auditors of the Company.	future.
4.	Annual Listing Fees for the F.Y. 2023-24	In Accordance with the Listing Agreement with Exchange.	Non – payment of Annual Listing Fees for the F.Y. 2023-24	BSE	Interest levied	NA	The company has not paid Annual Listing Fees for FY 2023-24 due to administrative reasons.	The Company has duly paid said Fees at a later date along with Interest. The abundant Precaution will be taken for timely payment to the Exchanges.

I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
1.	**Secretarial Standards:**	No	As provided in

	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.		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 document(s)/ section of the website.	Yes	-
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	Yes	-

	Regulations, 2015.		
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	There was a delay in recording certain entries in the Structural Digital Database; however, they were subsequently captured at a later stage.
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.	No	As provided in Table (a) of said report
12.	**Resignation of statutory auditors from the listed entity or its material subsidiaries:** In case of resignation of statutory auditor from the	Yes	-

	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.		
13.	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	-

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 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.

The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of applicable compliances.

Thanking you,

For Deepti & Associates
Practicing Company Secretaries

Sd/-
Deepti Grover
Proprietor
FCS. No. 7654 | C.P.: 17546
FRN: S2016DE438900 **Date: May 30, 2025**
UDIN: L29109GJ2010PLC063243 **Place: New Delhi**