CIN No. : L22219GJ2010PLC063243

Date: 15th September 2026

To,
BSE Limited
Department of Corporate Services,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400 001
Scrip Code: 539228

Dear Sir/Ma'am,

Sub.: Board Comments on the fine levied by the Bombay Stock Exchange Limited

Pursuant to the SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 ("Master Circular") issued on July 11, 2023 and last updated on January 30, 2026, we wish to inform you that an email received from the Bombay Stock Exchange (BSE) dated August 14, 2026, levying a fine of Rs. 56,640/- (incl. of 18% GST) for non compliance, and a subsequent email dated August 31, 2026, levying a revised/enhanced fine of Rs. 96,760/- (incl. of 18% GST) on account of continuation of the said non-compliance, were placed before the Board of Directors at its meeting held on September 12, 2026.

The Board reviewed the matter regarding the non-submission of shareholding pattern within the period prescribed under this Regulation 31 of SEBI Listing Regulations, for the quarter ended June 30, 2026.

The Board noted that the delay in submission occurred due to delay in receipt of the requisite data, which was contingent upon completion of certain administrative formalities, including remittance of applicable fees to the Registrar and Share Transfer Agent (RTA) and the Exchange. On account of this, the data required for preparation and submission of the Shareholding Pattern could not be obtained within the stipulated timeline.

The Board further noted that the said formalities have since been completed, and the Company is now fully compliant with the requirement of submission of the Shareholding Pattern.

The Board also noted that the fine of Rs. 96,760 (incl. of 18% GST) levied by the Exchange in this regard is under process of payment, and the Company shall ensure remittance thereof at the earliest.

You are requested to kindly take the same on your record
Thanking you

FOR GALA GLOBAL PRODUCTS LIMITED

GALA VISHAL MULCHANDBHAI
Digitally signed by GALA VISHAL MULCHANDBHAI
Date: 2026.09.15 17:47:17 +05'30'

VISHAL MULCHANDBHAI GALA
Director
DIN: 00692090

GALA GLOBAL PRODUCTS LIMITED
(Branch Offices : Gujarat - Andhra Pradesh - Telangana - Uttar Pradesh - West Bengal)
Registered Add : B-1, LAXMI ESTATE, OLD NAVNEET PRESS COMPOUND, AJOD DAIRY ROAD, SUKHRAMNAGAR, AHMEDABAD- 380021, GUJARAT. PHONE : 7575 00 6161 / 7575 000 250 E-mail : inf.galaglobal@gmail.com

Gmail

CS gala <cs.gala2003@gmail.com>

539228-Reminder for freezing of promoters’ demat account pursuant to the SEBI SOP circulars

1 message

bse.soplodr <bse.soplodr@bseindia.com> Mon, Aug 31, 2026 at 6:39 PM
To: "inf.galaglobal@gmail.com" <inf.galaglobal@gmail.com>, "cs.gala2003@gmail.com" <cs.gala2003@gmail.com>, "csvandanabaldi@gmail.com" <csvandanabaldi@gmail.com>, "GALA_PRODUCTS_PVT_LTD@YAHOO.COM" <GALA_PRODUCTS_PVT_LTD@yahoo.com>, "vishagalu4ever@yahoo.com" <vishagalu4ever@yahoo.com>, "vishal_gala@yahoo.com" <vishal_gala@yahoo.com>, "Alag.vishal@gmail.com" <Alag.vishal@gmail.com>
Cc: "bse.soplodr" <bse.soplodr@bseindia.com>

Ref.: SOP/Reminder-QTR-June 2026

To;

Company Secretary & compliance officer/ Promoter of the company
Company Name: Gala Global Products Ltd
Scrip Code: 539228

Dear Sir/Madam,

Sub: Reminder for freezing of promoters’ demat account as per SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 issued on July 11, 2023 and last updated on January 30,2026 (Chapter VII (A)-Penal Action for Non-Compliance)

Pursuant to SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 issued on July 11, 2023 and last updated on January 30,2026 -chapter-VII(A)-Penal Actions for Non-Compliance has, inter-alia, prescribed certain penal actions such as levy of financial fines, freezing of promoter demat accounts, transfer to Z group (Trade for Trade) ending with suspension of trading in the securities of the listed entities which do not comply with critical regulations of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

It is observed that as per the latest shareholding pattern submitted by Gala Global Products Ltd ,(scrip code: 539228), your name has been included in the list of promoters of the company.

The company is non-compliant/not paid fines with the provisions of **following Regulation(s)** for the period mentioned below. As mandated in the SEBI SOP circular the company has been intimated about the pending compliance and has also been informed that **all the promoters’ demat accounts would be frozen if the compliance was not completed and fines not paid.**

The details of fines levied, inter alia, pursuant to aforesaid SEBI Master Circulars are as under:

Applicable Regulation of SEBI (LODR) Regulations, 2015	Fines levied for	Compliance status	Fine amount outstanding as on August 31,2026 (incl. GST @ 18 %) (Amount in Rs.)
Regulation 31 Non-submission of shareholding pattern within the period prescribed	Quarter ended June 2026	Non Submission	96760

(*)As per the provisions of the circular the fines will continue to be computed further till the time of rectification of the non-compliance to the satisfaction of the Exchange or till the scrip of the listed entity is suspended from trading for non-compliance with aforesaid provisions.

As per Exchange records, it is observed that the company **has not yet complied/ not paid the fines.** Therefore, as in duty bound in terms of the provisions of SEBI SOP circular the Exchange would be proceeding to give instructions to the depositories to **freeze the demat accounts of all the entities mentioned in the shareholding pattern by the company, within 10 days from the date of this communication**.

It may also be noted that presently the SEBI circular stipulates that the freeze on promoter demat accounts should be lifted only after the company complies and pays fines.

(Note: For unfreezing of promoters demat accounts, the Company is required to comply with all the pending compliances and pay all the outstanding fines levied under **SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 issued on July 11, 2023 and last updated on January 30,2026** ***(erstwhile SEBI Circular SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 , SEBI Circular no. SEBI/HO/CFD/CMD/CIR/P/2018/77 dated May 03, 2018, and SEBI SOP Circular No. SEBI/HO/CFD/CMD/CIR/P/2016/116 dated October 26, 2016, SEBI CIRCULAR NO CIR/CFD/CMD/12/2015, SEBI Circular CIR/MRD/DSA/31/2013 dated September 30, 2013)***

It may be noted that:

- Policy for exemption of fines detailing the reasons for waiver / reduction of fines levied as per the provisions of SEBI SOP circular is disseminated on the Exchange website at the following link: https://www.bseindia.com/downloads1/Policy_for_Exemption_of_Fines_SOP.pdf
- An application for waiver of fines submitted by the company if any, will be considered **only after the applicant company has first complied with the compliances for which it is seeking full / partial waiver of fines**, as required under the Listing Regulation.
- An illustrative list of scenarios which cannot be considered to fall within the ambit of "events" entailing waiver or reduction of fine has been included in the policy disseminated on the Exchange website at aforesaid link. https://www.bseindia.com/markets/MarketInfo/DispNewNoticesCirculars.aspx?page=20250826-47
- The request of waiver of fine can be submitted to Exchange through Listing center along with documentary evidence at the following path :

  Listing Centre > Listing Operations > Listing Module > Issue Type > Waiver > Sub process > Waiver (Please note that waiver applications sent via mail will not be considered)
- The decision of the Exchange shall be final and repeated applications for waivers that are declined earlier, would not be entertained, unless there are any mitigating fresh facts. The Exchange reserves the right to accede to or deny the request for waiver/ reduction in penalty, for reasons to be recorded in writing.

Yours faithfully

Reena Raphel	**Hasti Vora**
Manager	**Deputy Manager**
Listing Compliance	**Listing Compliance**

In case of any further queries / clarifications please email the following ids:

Particulars	**Email Id**	**Contact Number**
Query on compliance of Regulation 31	**Hasti.Vora@bseindia.com**	**022-22728537**
Query on remittance	**bse.soplodr@bseindia.com**	**022-22728194**

Company is requested to remit the fine amount to the following designated **VIRTUAL BANK ACCOUNT** of the Exchange:

Company Name	Gala Global Products Ltd		
Account Name	**Bank Name & Branch**	**Virtual Bank Account No.***	**IFSC Code**
BSE Limited	ICICI Bank Ltd.- CMS Branch	BSER10946	ICIC0000104

Note: This bank account is specifically dedicated to SOP fine and Waiver fees only, Therefore, company is advised not to deposit/credit any amount payable other than SOP fines/penalties/waiver.

The company is required to submit fine remittance details in the following format given at Annexure I to Email id: bse.soplodr@bseindia.com

Annexure-I (On letterhead of the company)

Sub: Details of Payment of fines for Non-Compliance with Regulations of SEBI (LODR) Regulations, 2015.

Remittance details:

Scrip Code	Regulation & Quarter	Bank UTR number	Date of Payment	Amount paid	TDS deducted, if any	Net Amount paid

This mail is classified as 'CONFIDENTIAL' by Reena Raphel on August 31, 2026 at 18:39:32.

Gmail

CS gala <cs.gala2003@gmail.com>

539228-Fines as per SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 issued on July 11, 2023 and last updated on January 30,2026 (Chapter VII (A)-Penal Action for Non-Compliance)

2 messages

bse.soplodr <bse.soplodr@bseindia.com> Fri, Aug 14, 2026 at 4:30 PM
To: "inf.galaglobal@gmail.com" <inf.galaglobal@gmail.com>, "cs.gala2003@gmail.com" <cs.gala2003@gmail.com>, "csvandanabaldi@gmail.com" <csvandanabaldi@gmail.com>
Cc: "bse.soplodr" <bse.soplodr@bseindia.com>

Ref.: SOP-Review/ QTR-Jun-26

To

The Company Secretary/Compliance Officer

Company Name: Gala Global Products Ltd

Scrip Code: 539228

Dear Sir/Madam,

Sub: Fines as per SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 issued on July 11, 2023 and last updated on January 30,2026 (Chapter VII (A)-Penal Action for Non-Compliance)

The company is advised to refer to the SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 issued on July 11, 2023 and last updated on January 30,2026 issued by Securities and Exchange Board of India (SEBI) with respect to penal actions prescribed for non-compliance of certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Standard Operating Procedure for suspension and revocation of trading of specified securities of listed entities.

The Exchange had also issued a guidance note regarding the provisions of the said SEBI circular which is disseminated on the Exchange website at the following link:

https://www.bseindia.com/downloads1/Guidance_Note_for_SEBI_SOP_Circular.pdf

In this regard it is observed that the company is non-compliant/late compliant with the following Regulations for the period mentioned below:

Applicable Regulation of SEBI (LODR) Regulations, 2015	**Fine prescribed (*)**	**Fines levied**	**Fine payable by the company (inclusive of GST @ 18 %) as on August 14,2026**			**Compliance status**
			Basic Fine	**GST @ 18 %**	**Total Fine payable**	
Regulation 31 Non-submission of shareholding pattern within the period prescribed	Rs. 2,000/- per day till the date of compliance.	For the quarter ended June 2026	48000	8640	56640	Non Submission
		Total SOP Fine	48000	8640	56640	

(*)As per the provisions of the circular the fines will continue to be computed further till the time of rectification of the non-compliance to the satisfaction of the Exchange or till the scrip of the listed entity is suspended from trading for non-compliance with aforesaid provisions.

The Company is therefore advised to note that as per the provisions of this circular:

- The company is required to ensure compliance with above regulation and ensure to pay the aforesaid fines including GST within 15 days from the date of this letter/email, **failing which Exchange shall, pursuant to the provisions of the aforesaid circular, initiate action related to freezing of the entire shareholding of the promoter in this entity as well as all other securities held in the**

demat account of the promoter. The company is advised to bring the provisions of this Circular to the notice of promoter of the company.

- Further in the event of this being the second consecutive year of non-compliance for the Regulation 31 would result in the company being transferred to Z group and liable for suspension of trading of its equity shares.

- The company is also advised to ensure that the subject matter of non-compliance which has been identified and indicated by the Exchange and any subsequent action taken by the Exchange in this regard shall be placed before the Board of Directors of the company in its next meeting. Comments made by the board shall be duly informed to the Exchange for dissemination.

Yours faithfully

Reena Raphel **Hasti Vora**

Manager-Listing Compliance **Deputy Manager- Listing Compliance**

In case of any further queries please email the following ids:

Particulars	**Email Id**
Query on compliance of Reg.31	Hasti.Vora@bseindia.com
Query on remittance	bse.soplodr@bseindia.com

Company is requested to remit the fine amount to the following designated **VIRTUAL BANK ACCOUNT** of the Exchange:

Company Name	Gala Global Products Ltd		
Account Name	**Bank Name & Branch**	**Virtual Bank Account No.***	**IFSC Code**
BSE Limited	ICICI Bank Ltd.- CMS Branch	BSER10946	ICIC0000104

-

Note: This bank account is specifically dedicated to SOP related fines only, Therefore, company is advised not to deposit/credit any amount payable other than SOP fines/penalties.

The company is required to submit fine remittance details in the following format given at Annexure I to Email id: bse.soplodr@bseindia.com

-

Annexure-I (On letterhead of the company)

Sub: Details of Payment of fines for Non-Compliance with Regulations of SEBI (LODR) Regulations, 2015.

Remittance details:

-

Scrip Code	**Regulation & Quarter**	**Bank UTR number**	**Date of Payment**	**Amount paid**	**TDS deducted, if any**	**Net Amount paid**

This mail is classified as 'CONFIDENTIAL' by Reena Raphel on August 14, 2026 at 16:30:18.

CS gala <cs.gala2003@gmail.com> Mon, Aug 17, 2026 at 11:54 AM
To: Sachin Thakkar & Associates <sachinthakkar911@gmail.com>

[Quoted text hidden]