



LEEL ELECTRICALS LIMITED

(Formerly Lloyd Electric & Engineering Limited)

Reg. Office: A-603 & 604. Logix Technova, Sec-132, Noida, U.P. PIN 201304

Contact No: 0120-4098444, 9910616750

E-mail: info@leeelectric.com

Dated: 05.06.2026

To,

BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400001 Fax No.: 022-22721919	National Stock Exchange of India Limited Exchange Plaza, Plot No. C/1, G Block, Bandra- Kurla Complex Bandra (E), Mumbai – 400051 Fax No.: 022-26598120
Ref.: LEEL Electricals Limited (Scrip – 517518) ISIN- INE245C01019	Ref.: LEEL Electricals Limited (Symbol – LEEL) ISIN- INE245C01019

Sir/Mam,

Subject: Submission of Annual Secretarial Compliance Report in pursuance of Regulation 24A of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015.

Pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith the Annual Secretarial Compliance Report of the Company, duly issued by M/s G Aakash & Associates, Company Secretaries, for the Financial Year ended March 31, 2023.

That the XBRL filing of the same could not be made due to technical error in validation.

This is for your information and record.

Thanking You,

Yours Sincerely

For LEEL Electricals Limited

NEERAJ GUPTA
Digitally signed by NEERAJ
GUPTA
Date: 2026.06.05 17:28:34
+05'30'

NEERAJ GUPTA
Managing Director
DIN: 07176093



G AAKASH & ASSOCIATES

Company Secretaries

SECRETARIAL COMPLIANCE REPORT

OF LEEL ELECTRICALS LIMITED FOR THE YEAR ENDED 2022-23

We have examined:

- (a) all the documents and records made available to us and explanation provided by **Leel Electricals 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 **2022-23** in respect of compliance with the provisions of :
 - I. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - II. 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 for compliance by the company during the year under report, 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;*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2022;*
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;*
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) (Amendment) Regulations, 2016;*



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(j) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;*

(k) Securities and Exchange Board of India (Depository & Participants) Regulations, 2018; and circulars/ guidelines issued thereunder;

[*Note: During the year under report, no event has occurred attracting provisions of these Regulations]

We hereby report that, during the Review Period the compliance status of the listed entity is appended below;

Sr. No.	Particulars	Compliance status (Yes/ No/ NA)	Observations/ Remarks PCS*
1	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	YES	None
2	<u>Adoption and timely update of the Policies:</u> <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 has been reviewed & timely updated as per the regulations / circulars/ guidelines issued by SEBI	YES YES	None None
3	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none">• The Listed entity is maintaining a functional website• Timely dissemination of the	YES YES	None None



	<p>documents/ information under a separate section on the website</p> <ul style="list-style-type: none"> • 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	None
4	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	YES	None
5	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	NA NA	None None
6	<p><u>Preservation of Documents:</u></p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as Documents per Policy of Preservation of and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	YES	None
7	<p><u>Performance Evaluation:</u></p> <p>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</p>	YES	None
8	<p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions</p>	YES	None



	(b) 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	NA	None
9	<u>Disclosure of events or information:</u> 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	None
10	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	YES	None
11	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No action has been taken against the listed entity by SEBI or Stock exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued there under.	NO	None
12	<u>Resignation of Statutory Auditors from the listed Entities or its material Subsidiaries</u> 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.	NA	None
13	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/	YES	No additional non-compliances



	circular/guidance note etc.		were observed for any SEBI regulation/ circular/ guidance note etc. during the year under review.
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In addition to the above, we would like to state the following points in order to maintain the fairness of the report:

1. The Corporate Insolvency Resolution Process ("CIRP") was initiated, on a petition filed by MKM Technologies Private Limited ('the Operational Creditor') under Section 9 of the Insolvency and Bankruptcy Code 2016 ("IBC 2016"), against the Company, being admitted vide an order of Hon'ble National Company Law Tribunal ("NCLT"), Allahabad Bench dated March 04, 2020. Further, pursuant to the said Order passed by the Hon'ble NCLT, Allahabad, Mr. Arvind Mittal bearing Registration No. IBBI/PA-001/IPP01358/2018 was appointed as the Interim Resolution Professional (IRP) from the date of the Order and the powers of the Board of Directors stood suspended, during the pendency of the proceedings and were exercised by Mr. Arvind Mittal till he continued to be the Interim Resolution Professional. Thereafter, Mr. Ganga Ram Agarwal bearing Registration No. IBBI/IPA-002/IP-N00874/2018-1920/12777 was appointed on the said position and he, in his capacity as RP, took control and custody of the management and operations of the Company, vide Hon'ble NCLAT, New Delhi Order dated 21.12.2020 in Company Appeal (AT) (Insolvency) No. 1100 of 2020.

2. Upon the failure to achieve a Resolution Plan, the Liquidation proceedings were initiated against the Company by an Order dated 06.12.2021 of Hon'ble NCLT in CP (IB)/189/ALD/2019 and the RP was confirmed as liquidator of the Company.

3. After following due process of law as prescribed under the IBC and the Insolvency and Bankruptcy Board of India (Liquidation Process) Regulation, 2016 ("Liquidation Regulation"), the Company was successfully sold as a going concern under Liquidation to the Successful Bidder ("Krishna Ventures Limited"/ "KVL"/ "Acquirer"). The Hon'ble NCLT by its order dated 21.03.2024 inter-alia approved the directions for implementing sale of the Company as a going concern to a Successful Auction Purchaser i.e. Krishna Ventures Limited (KVL/Acquirer). For which, the Liquidator issued the Sale Certificate dated 12.06.2024 for sale of the Company as going concern pursuant to the provisions of the Insolvency and Bankruptcy Code, 2016 (Code).

4. The Directors of the Reconstituted Board were not in office for the period to which this report primarily pertains. During the CIRP/Liquidation period (i.e. March 4th, 2020 to July 1st, 2024) the Resolution Professional/Liquidator was entrusted with the management



of the Company. Prior to the Insolvency Commencement date, the erstwhile Board of Directors had the oversight on the management of the affairs of the Company.

5. The reconstituted Board is not to be considered responsible to discharge fiduciary duties with respect to the oversight on financial and operational health of the Company and performance of the management for the period prior to the Acquisition, in accordance with the Section 32A of the Insolvency and Bankruptcy Code, 2016. However, due to the fact that the Company was under CIRP, no records were available with the new management of the Company. The Company is in the process of implementation of the Approved NCLT Order and have undertaken activities of compliance to the various applicable provisions of the laws.

6. During the period under review, the Company was under CIRP and the Resolution Professional/Liquidator was entrusted with the management of the Company. Hence, in accordance with Regulation 15(2A) and 15(2B), the provisions related to Regulation 17, 18, 19, 20 and 21 shall not be applicable on the Company during the CIRP proceedings. Accordingly, the role and responsibilities of the Board of Directors after the Commencement of Corporate Insolvency Resolution Process (CIRP) was being fulfilled by Resolution Professional/Liquidator in accordance with the provisions of Insolvency and Bankruptcy Code 2016 and powers of the Board of Directors and Committees were suspended.

- The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, except in respect of matters specified below: –

Sr. no	Compliance Requirement (Regulations/ circulars/ Guidelines including specific clause)	Regulation/ Circular No.	Deviation	Action Taken by	Type of violation	Details of violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remark
-	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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



Sr. no	Compliance Requirement (Regulations/ circulars/ Guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of violation	Details of violation	Fine Amount	Observations/ Remarks of the Practicing Management Response	Remark
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Place: Haryana
Date: 02.12.2025

For G Aakash & Associates
Company Secretaries



Aakash Goel

Aakash Goel
(Prop.)
M. No.: A57213
CP No.: 21629