SULABH
Engineers And Services Limited
CIN: L28920MH1983PLC029879

Web : www.sulabh.org.in
Email : sulabheng22@gmail.com,
sulabhinvestorcell@gmail.com

Date: 21.11.2026
Ref.: SOP-CReview/QTR-Sep-26

To,
BSE Limited
Department of Corporate Services – Listing Compliance

Scrip Code: SULABEN (508969), ISIN: INE673M01029

Sub: Disclosure under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 – fine levied by the Exchange alleging non-compliance with Regulation 6(1)

Dear Sir/Madam,

Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Listing Regulations"), the Company hereby discloses the following.

Event disclosed

On 20 November 2026, the Company received an email from the Exchange bearing the above reference. The email was issued under SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 (Chapter VII(A) – Penal Action for Non-Compliance). It states that the Company is non-compliant with Regulation 6(1) of the Listing Regulations for the quarter ended 30 September 2026 and levies a fine on that account.

Details under Regulation 30 of the SEBI Listing Regulations read along with SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023

Particular	Details
Regulation alleged to be violated	Regulation 6(1) of the Listing Regulations
Requirement (nature)	Appointment of a qualified company secretary as compliance officer
Period	Quarter ended 30 September 2026
Status recorded by the Exchange	"Non-complied"
Fine basis stated by the Exchange	Rs. 1,000 per day
Basic fine	Rs. 92,000
GST @ 18%	Rs. 16,560

Particular	Details
Total fine payable as on 20 November 2026 (detail of action)	Rs. 1,08,560
Name of Authority	Bombay Stock Exchange
Date of receipt of communication	20.11.2026
Impact on financial operation and other activities of the Listed Company	As company is communicating with exchange for quashing of the fine (as there is no non-compliance of the alleged violation, therefore, no impact on the financial {except to the extent of the amount levied [if any]}, operation, other activities of the listed entity)
Due date of payment	Within 15 days from the date of the notice.
Type of communication received	Email dated 20.11.2026 (508969-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)
Brief summary of the material contents of the communication received, including reasons for receipt of the communication	Company has received a mail in which stock exchange has levied a fine for non-appointment of Company Secretary as a compliance officer.

Nature of the alleged violation

The Exchange's allegation is that the Company did not have a qualified company secretary appointed as compliance officer during the quarter ended 30 September 2026.

The Company's understanding is that the allegation arises from the entry in its quarterly report under Regulation 76 of the SEBI (Depositories and Participants) Regulations, 2018, filed for that quarter, in which the field "Company Secretary appointment" was marked "No" inadvertently and same was revised by the Company by selecting "yes" under that company secretary appointment and the query was closed by the BSE.

Company's position

The Company's position is that there has been no non-compliance with Regulation 6(1) of the Listing Regulations, for the following reasons:

(a) Mr. Tauheed Ahmad (Membership No. A74592) has been appointed as Company Secretary and Compliance Officer with effect from 14 June 2025. He functioned in that capacity throughout the quarter ended 30 September 2026 and continues to do so as on the date of this disclosure.

(b) The Regulation 76 report for the quarter ended 30 September 2026 was filed on 7 October 2026. The field "Company Secretary appointment" was marked "No" instead of "Yes". This was a clerical error and did not reflect a lapse in compliance.

(c) On 31 October 2026, the Exchange raised a discrepancy on the filing. The Company corrected the entry and re-filed the report on the same day, selecting "Yes". The Exchange closed the query on 3 November 2026.

(d) On 21 November 2026, the Company wrote to the Exchange, enclosing the revised filing with its acknowledgement and the Exchange's query-closure communication. The Company requested that the fine be withdrawn.

Current Status

(a) As on the date of this disclosure, the fine of Rs. 1,08,560 has not been paid and the company is communicating with the exchange for quashing of the fine as there is no non-compliance of regulation 6(1).

(b) The Company will comply with any further direction of the Exchange in this matter.

(c) The matter will be placed before the Board of Directors at its next meeting. The Company will disclose the Board's comments to the Exchange, as required.

This disclosure is made in compliance with Regulation 30 of the Listing Regulations. We request you to kindly take the same on record and disseminate it.

Thanking you,
Yours faithfully,
For Sulabh Engineers and Services Limited

Tauheed Ahmad
Digitally signed by Tauheed Ahmad
Date: 2026.11.21 11:40:45 +05'30'

Tauheed Ahmad
Company Secretary and Compliance Officer
Membership No.: A74592
Date: 21.11.2026