



Company Secretary (Membership No. 60165)

Pranay Mandhana & Associates

Peer Review certificate no. 5613/2024

117 Central Avenue Road

Gitanjali talkies Square, Nagpur - 440 018

ANNUAL SECRETARIAL COMPLIANCE REPORT

Secretarial Compliance Report of EAST INDIA DRUMS AND BARRELS MANUFACTURING LIMITED for the financial year ended 31st March, 2025

To

The Members

EAST INDIA DRUMS AND BARRELS MANUFACTURING LIMITED

(Formerly known as Precision Containeurs Limited)

201, A Wing, Jwala Estate, Pushpa Vinod-2, Soni Wadi, S.V. Road,
Behind MacDonald, Borivali West, Mumbai, 400092

I, **Pranay Mahesh Mandhana**, Practising Company Secretary, has examined

- a) All the documents and records made available to me and explanation provided by **EAST INDIA DRUMS AND BARRELS MANUFACTURING LIMITED (Formerly known as Precision Containeurs Limited) (CIN: L28920MH1981PLC023972)**
- 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 **31st March, 2025** ("Review Period") 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, 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 Requirement) 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**;
- (e) Securities And Exchange Board Of India (Share Based Employee Benefits And Sweat Equity) Regulations, 2021 – **Not Applicable**;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 – **Not Applicable**;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 – **Not Applicable**;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996;

I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

S.No.	Particulars	Compliances Status (Yes/No/NA)	Observations/Remarks by PCS
1.	<p><u>Secretarial Standards</u></p> <p>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</p>	YES	None
2	<p><u>Adoption and timely updation of the Policies</u></p> <p>*All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities.</p> <p>* All the policies are in conformity with SEBI Regulations and have been reviewed and updated on time as per the regulations /circulars/guidelines issued by SEBI.</p>	YES	None

3.	<p><u>Maintenance and disclosures on Website</u></p> <p>*The Listed entity is maintaining a Functional website</p> <p>*Timely dissemination of the documents/information under a separate section on the website</p> <p>*Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant documents(s)/section of the website.</p>	YES	The Company has filed all the disclosures on the stock exchange within the prescribed time.
4.	<p><u>Disqualification of a Director</u></p> <p>None of the Director (s) of the Company are disqualified under Section 164 of the Companies Act, 2013 as confirmed by the Listed Entity.</p>	YES	None
5.	<p><u>Details related to Subsidiaries or listed entities have been examined w.r.t.</u></p> <p>a) Identification of material subsidiary companies</p> <p>b) Disclosure requirement of material as well as other subsidiaries</p>	NA	The Company does not have any subsidiary company.
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 per Policy of Preservation of documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	YES	None
7.	<p><u>Performance Evaluaition</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 Transaction</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions ; or</p> <p>(b) The listed entity has provided detailed reasons along with the confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	YES	None
9	<p><u>Disclosure of events or information</u></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder</p>	YES	None
10.	<p><u>Prohibition of Insider Trading</u></p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulation, 2015</p>	YES	None
11	<p><u>Actions taken by SEBI or Stock Exchange (s) if any</u></p> <p>No action(s) has been 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 though various circulars) under SEBI Regulations and circulars/guidelines issued thereunder except as provided under Separate Paragraph herein (**Observation 1,4 (i)(ii)) Paragraphs herein)</p>	NO	Separately mentioned in Detailed Observations attaching to this report

12	<u>Resignation of statutory auditors from the listed entity or its material</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.	YES	During the year under review, Statutory Auditors, M/s. Dhiraj & Dheeraj Chartered Accountants, has been appointed as Statutory Auditors of the Company at the AGM held on 26/08/2024 for the period of five year.
13	<u>Additional Non-Compliances, if any</u> Additional non-compliance observed for any SEBI Regulation/circular/ guidance note etc.	NO	It is observed that the Company Secretary has resigned with effect from April 17, 2025, and the Company has not appointed a replacement as of this date. However, the Company has a period of three months from the date of resignation to comply with the requirement under law.

(**) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, below mentioned are the certain observations arising from specific events during the year:

I hereby report that, during the Review Period:

- a) During the year under review, pursuant to the approval of the Resolution Plan by the Hon'ble National Company Law Tribunal (NCLT), Mumbai Bench, on 2nd May 2023 in the matter of C.P. (IB) 2146 (MB) of 2019 filed by Stressed Assets Stabilization Fund (SASF) under Section 7 of the Insolvency and Bankruptcy Code, 2016, East India Drums & Barrels Manufacturing Private Limited was amalgamated into Precision Containeurs Limited in accordance with the terms of the approved Resolution Plan.

Subsequently, after completion of necessary compliances and approvals, the name of the Company was changed from Precision Containeurs Limited to East India Drums & Barrels Manufacturing Limited with effect from 26th April 2024, as per the Certificate of Incorporation pursuant to change of name issued by the Ministry of Corporate Affairs.

The business operations of the amalgamated entity are now being carried out under the name East India Drums & Barrels Manufacturing Limited from the said effective date.

- b) The Listed entity has maintained proper records under the provisions of the above Regulations and Circulars/guidelines issued thereunder insofar as it appears from my/our examination of those records. The Company's maintaining all disclosures on website from time to time.
- c) The following are the details of actions taken against the listed entity/its promoters/directors/material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/guidelines issued thereunder:

S.No.	Compliances Requirement (Regulation/circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary/Company
1.	Regulation 6(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015	Company was required to appoint Company Secretary cum Compliance Officer for the Financial year 2024-2025	<p>During the year under review, Mr. Hariram Bijalni served as the Whole-Time Company Secretary and Compliance Officer until 30th June 2024. Thereafter, Mr. Shrikant Kabra was appointed as Company Secretary with effect from 1st August 2024 and continued in that position until 17th April 2025.</p> <p>As on the date of this report, the position of Whole-Time Company Secretary and Compliance Officer remains vacant. The Company has not yet complied with Regulation 6(1) of the SEBI (LODR) Regulations, 2015 following the resignation of the previous Company Secretary. However, in accordance with the</p> <p>said regulation, the Company has a period of three months from the date of resignation to appoint a new Company Secretary and Compliance Officer, and this period is still ongoing.</p>
2	Securities Appellate, Tribunal, Mumbai	Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers	The Company is taking necessary steps to comply with SEBI's order dated 16.03.2023 during the reporting period. As directed, action was initiated regarding the transfer/sale of shares acquired beyond the 5% threshold, and the

		Regulation 1992)	proceeds were deposited with the Investor Education and Protection Fund (IEPF) within the stipulated time.
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b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr.No.	Observations of the Practicing Company Secretary in previous reports	Observations made in the Secretarial Compliance Report for the Year ended 2025	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the company
1	Regulation 31(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015	Company was required to hold 100% of shareholding of Promoter and Promoter Group in Dematerialized form; however 7700 Equity shares of the Promoter and Promoter Group held by Mr.Vinodrai Vrijlal Valia is pending for Dematerialization	The said 7700 equity shares have been dematerialized and now 100% shareholding of Promoter and Promoter Group is held in dematerialized form	The Company has taken appropriate steps to comply with the regulation. The observation has been fully complied with and no further action is required.
2	Regulation 31(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation 2015	Shareholding of Promoter and Promoter Group was required to be held in dematerialized form	As per NCLT Order dt 02-05-2023 Approving the Resolution plan with the scheme of Merger, the entire Promoters shareholding of 30,25,675 equity shares become complete extinguishment & the same has been accepted by the promoters of the company	The Company has acted in accordance with the directions of the Hon'ble NCLT. In view of the extinguishment of promoter shareholding as per the approved Resolution Plan, the requirement under Regulation 31(2) no longer applies.

3	Securities Appellate, Tribunal, Mumbai	SEBI passed an order dated 16.03.2023 against Vas Infrastructure Ltd. and other Group Companies for failure to make disclosures as required under SEBI Act, 1992 and applicable regulations, in respect of allotment of equity shares during FY 2009-10, resulting in promoter shareholding exceeding 5%	The Company is in the process of complying with the directions issued by SEBI pursuant to the said order Securities and Exchange Board of India has directed the Company.	The Company is taking necessary steps to comply with SEBI's order dated 16.03.2023 during the reporting period. As directed, action was initiated regarding the transfer/sale of shares acquired beyond the 5% threshold, and the proceeds were deposited with the Investor Education and Protection Fund (IEPF) within the stipulated time. Further, the Promoters remained debarred from accessing the securities market for the one-year period as specified in the order.
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Assumptions and 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 or the listed entity.
2. My responsibility is to certify based on our examination or relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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 Obligation 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.

Date : 21.05.2025
Place : Nagpur
UDIN : A060165G000413419


CS Pranay Mandhana
Practising Company Secretary
ACS No. A60165
CP No. 23399

