

Date: 30.05.2025

To
BSE Limited,
Phiroze Jeejeebhoy Towers, Dalal Street,
Floor 25, M Samachar Marg, Fort,
Mumbai- 400 001

Scrip Code: 530745

Dear Sir/Madam,

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2025

In Compliance with Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed copy of Annual Secretarial Compliance Report for the Financial Year 2024-25 issued by M/s VCSR & Associates, Company Secretaries.

We would request you to please take the above on record.

Thanking You,
For ACS Technologies Limited

**ASHOK KUMAR
BUDDHARAJU**

Digitally signed by ASHOK KUMAR
BUDDHARAJU
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**Ashok Kumar Buddharaju
Chairman and Managing Director
(DIN: 03389822)**

SECRETARIAL COMPLIANCE REPORT
OF
M/S. ACS TECHNOLOGIES LIMITED
FOR THE FINANCIAL YEAR ENDED 31.03.2025
(Formerly known as LN INDUSTRIES INDIA LIMITED)

We, VCSR & Associates, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. ACS TECHNOLOGIES LIMITED (hereinafter referred as 'the listed entity'), having its Registered Office at Pardha Picasa, Level 7, Durgam Cheruvu Road, Madhapur, Hyderabad, Shaikpet, Telangana, India, 500081.,
- (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 financial year ended 31.03.2025 ("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 to the company during the audit period)
- (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 to the company during the audit period)



(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not Applicable to the company during the audit period)

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable to the company during the audit period)

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not Applicable to the company during the audit period)

(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; (Not Applicable to the company during the audit period)

(j) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

and circulars/ guidelines issued thereunder;

and based on the above examination, We hereby report that, during the Review Period:

(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:

Sr. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
No such cases										

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

Sr No.	Observations/Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended March 31, 2024.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	Non - submission	It was observed that	Disclosure of Shareholding	A delay of one day has	The listed entity	The listed entity has



	of Shareholding Pattern to BSE for the quarter ending 30.06.2023 within the timeline specified under Regulation 31(1)(b) of SEBI [LODR] Regulations, 2015	a delay of one day has occurred in Submission of Shareholding Pattern to BSE for the quarter ending 30.06.2023	Pattern under Regulation 31(1)(b) of SEBI [LODR] Regulations, 2015.	occurred in Submission of Shareholding Pattern to BSE for the quarter ending 30.06.2023	assured that it will be more vigilant going forward to ensure the timely compliance as applicable to the listed entity as per the regulations.	taken proactive steps to ensure good governance.
2.	Disclosure of Statement of Investor Complaints/ Grievance Redressal Mechanism was not made for quarter's ending 30.06.2023 and 30.09.2023	No disclosure was made to BSE w.r.t statement of Grievance Redressal Mechanism for quarter's ending 30.06.2023 and 30.09.2023	Statement of Investor Complaints/ Grievance Redressal Mechanism under Regulation 13(3) of the SEBI [LODR] Regulations, 2015.	No disclosure was made to BSE w.r.t statement of Grievance Redressal Mechanism for quarter's ending 30.06.2023 and 30.09.2023	The listed entity assured that it will be more vigilant going forward to ensure the timely compliance as applicable to the listed entity as per the regulations.	The listed entity has taken proactive steps to ensure good governance.
3.	Filing of Reconciliation of Share Capital Audit Report was made to BSE beyond the due date for the quarter ending 30.06.2023	It was observed that a delay of eighteen days has been occurred in filing of Reconciliation of Share Capital Audit Report to BSE for the quarter ending 30.06.2023	Reconciliation of Share Capital Audit Report under Regulation 76(1) of the SEBI [Depositories and Participants] Regulations, 2018	Filing of Reconciliation of Share Capital Audit Report was made to BSE beyond the due date for the quarter ending 30.06.2023	The listed entity assured that it will be more vigilant going forward to ensure the timely compliance as applicable to the listed entity as per the regulations.	The listed entity has taken proactive steps to ensure good governance.
4.	The listed entity has not	It was observed that	Payment of listing fees &	The listed entity has not	The Company was under	Non compliance made good



	paid the Listing fee for the year ended 31.03.2024	the listed entity has not paid the Listing fee for the year ended 31.03.2024.	other charges under Regulation 14 of the SEBI [LODR] Regulations, 2015.	paid the Listing fee for the year ended 31.03.2024.	the process of merger and received the Merger Order of the Hon'ble NCLT, Hyderabad on 24 th March, 2023. The penalties finalized under merger order including those imposed by SEBI has already been paid in full and final settlement and received the trading approval of the SEBI	by paying full and final settlement amount.
5.	It was observed that the listed entity is maintaining functional website but it is not updated for the period ending 31.03.2024	It was observed that the listed entity is maintaining functional website but it is not updated for the period ending 31.03.2024	Website compliance under Regulation 46 of the SEBI [LODR] Regulations, 2015.	Violation of Regulation 46 of the SEBI [LODR] Regulations, 2015.	The listed entity assured that it will be more vigilant going forward to ensure the timely compliance as applicable to the listed entity as per the regulations.	Non Compliance made good by updating the website as required under Regulation 46 of the SEBI [LODR] Regulations, 2015.
6.	The listed entity has not maintained the SDD in a specific Database software which consist of features	It was observed that the listed entity has maintained SDD in Excel sheet but not in a specific	Structured Digital Database (SDD) under Regulation 3(5) of the SEBI (Prohibition of Insider	The listed entity has not maintained the SDD in a specific Database software which consist of features	Management noted and insisted the company secretary to comply the same.	Non compliance made good with the action of the management complying with Regulation



	such as Non-tamperable, Time-stamping and Audit trail.	Database software. Also observed that the listed entity has not submitted SDD certificate to BSE for the quarter ending 30.06.2023.	Trading) Regulations, 2015.	such as Non-tamperable, Time-stamping and Audit trail.		3(5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.
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(c) We 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.	<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	--
2.	<u>Adoption and timely updation 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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI. 	Yes	--
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 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 re-directs to the relevant document(s)/ section of the website. 	Yes	--



4.	<u>Disqualification of Director:</u> None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None of the Directors are disqualified
5.	<u>Details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes	--
6.	<u>Preservation of Documents:</u> 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.	Yes	--
7.	<u>Performance Evaluation:</u> 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	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (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.	Yes NA	-- No such instances observed.
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 the LODR Regulations within the time limits prescribed thereunder.	Yes	--
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	* Detailed remarks are mentioned below



11	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>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 (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	Yes	No actions has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges.
12.	<p><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></p> <p>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.</p>	NA	No resignation of statutory auditor from the listed entity or any of its material subsidiaries during the period under review.
13.	<p><u>No additional non-compliances observed:</u></p> <p>No additional non-compliance observed for any of the SEBI regulation/circular/guidance note etc. except as reported above.</p>	Yes	No such instances observed.

*(During the review we found that the listed entity is in compliance with Structured Digital Database as required under Regulation 3(5) SEBI (Prohibition of Insider Trading) Regulations, 2015. However, under the "Get Quote" page of the BSE Website of the Listed Entity it was displaying that the company is non-compliant with SDD. On being informed to management/ Compliance Officer of the listed entity they have replied as "We had earlier forwarded a detailed email to Ms. Jyanti Pradhan of BSE, who is the concerned authority for granting trading approval. After reviewing the submitted information, Ms. Pradhan proceeded to grant the trading approval, which was received on 29th April 2025. With regard to the removal of the "SDD Non-Compliant" tag, we have been in touch with Ms. Sunanda, who is handling the SDD compliance at BSE. She has informed us that the said tag will be removed after the successful completion of BSE's SDD inspection. We would like to inform you that the BSE SDD inspection is currently in process, and we are fully cooperating with the authorities to ensure timely completion.")

We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of the LODR Regulations - NA



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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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.

Place: Hyderabad
Date: 28.05.2025

For VCSR & Associates
Company Secretaries


(Ch. Veeranjanyulu)

Partner

M No. F6121, C P No.: 6392
UDIN: F006121G000471564
Peer Review No: 6686/2025

