

Ref No.: OTL/Secretarial/SE/2026-27/24

Date: May 28, 2026

To,

Bombay Stock Exchange Limited Phiroz Jeejeebhoy Towers, Dalal Street, Mumbai – 400023	National Stock Exchange of India Ltd., Plot No. C/1 'G' Block Bandra – Kurla Complex Bandra East, Mumbai 400051
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Ref: Scrip Code - BSE: 517536 | NSE: ONWARDTEC

Dear Sir/ Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2026

Ref: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019

Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 read with Clause 3 (b) (iii) of SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 and SEBI/HO/CFD/CMD/1/P/CIR/2021/556 dated April 29, 2021 we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2026 issued by M/s Nilesh A Pradhan & Co., LLP, Company Secretaries and Secretarial Auditor of the Company.

Kindly take the same on record

Thanking You,

Yours faithfully,

For **Onward Technologies Limited**

Aakash Joshi
Company Secretary & Compliance Office
Membership No :- A60953

Encl: As above.

NILESH A. PRADHAN & CO., LLP

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF ONWARD TECHNOLOGIES LIMITED FOR THE FINANCIAL YEAR ENDED MARCH 31, 2026

We Nilesh A. Pradhan & Co., LLP have examined:

- (a) all the documents and records made available to us and explanation provided by **Onward Technologies 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 Report,

for the financial year ended March 31, 2026 ("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 review 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 review period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable to the company during the review period)

LLP Identity No.AAN-6938
B-201, Pratik Industrial Estate, Near Fortis Hospital, Mulund-Goregaon Link Road, Mumbai- 400078.
☎91 - 9833785809, 7208488061/62 Email: info@napco.in

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; 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: As per Annexure A .


(b) The listed entity has taken the following actions to comply with the observations made in previous reports: As per Annexure B (Not Applicable)

- i. We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

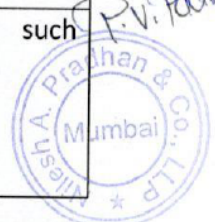
Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	None
2	Adoption and timely updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entitiesAll 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 Yes	None None



3	<p>Maintenance and disclosures on Website:</p> <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 	<p>Yes Yes Yes</p>	<p>None None None</p>
4	<p>Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	<p>Yes</p>	<p>None</p>
5	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	<p>Yes Yes</p>	<p>None None</p>
6	<p>Preservation of Documents: 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>	<p>Yes</p>	<p>None</p>
7	<p>Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	<p>Yes</p>	<p>None</p>

P.V. Padhye


8	<p>Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions;</p> <p>(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</p>	<p>Yes</p> <p>NA</p>	<p>None</p> <p>Prior Approval obtained</p>
9	<p>Disclosure of events or information: 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.</p>	<p>Yes</p>	<p>None</p>
10	<p>Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	<p>Yes</p>	<p>None</p>
11	<p>Actions taken by SEBI or Stock Exchange(s), if any: 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 through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.</p>	<p>NA</p>	<p>No such event</p>
12	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</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>	<p>NA</p>	<p>No such event</p>
13	<p>No Additional non-compliances observed: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above</p>	<p>NA</p>	<p>No such event</p>

P. V. Reddy


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.

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 certify 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 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 Obligations 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.

Place: Mumbai
Date: May 5, 2026

For Nilesh A. Pradhan & Co., LLP
Company Secretaries

P.V. Padhye



Prajakta V. Padhye
Partner

FCS No: 7478

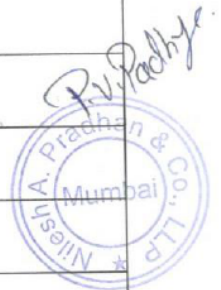
CP No: 7891

PR No: 1908/2022

UDIN: F007478H000277275

ANNEXURE -A

Sr. No.	1
Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Any person can be appointed as a trustee of the trust, except in cases where such person— i. is a director, key managerial personnel or promoter of the company or its group company including its holding, subsidiary or associate company or any relative of such director, key managerial personnel or promoter; or ii. beneficially holds ten percent or more of the paid-up share capital or the voting rights of the company:
Regulation/ Circular No.	Regulation 3(4) of the Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021
Deviations	One of the Trustees of Onward Technologies Employee Welfare Trust was a director of the subsidiary Company. The said Trustee resigned from the subsidiary before the date of signing of this report.
Action Taken by	NA
Type of Action	NA
Details of Violation	NA
Fine Amount	NA
Observations/ Remarks of the Practicing Company Secretary	One of the Trustee was a director of subsidiary Company.
Management Response	The appointment was made inadvertently and upon becoming aware of it, was promptly rectified. The concerned Trustee resigned from the Directorship of the subsidiary Company.
Remarks	The immediate necessary required action was taken by the Company on becoming aware of deviation.



ANNEXURE -B

Sr. No.	Observations/ Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year	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
NOT APPLICABLE						