

PATBACK BUSINESS LIMITED

Regd. Office: Shop No. 325, Plot No.3, Aggarwal Plaza, DDA Community Center, Sector-14, Rohini, Delhi-110085

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CIN: L74999DL1984PLC018747

May 14, 2025

To

Metropolitan Stock Exchange of India Limited

205(A), 2nd floor, Piramal Agastya Corporate Park,
Kamani Junction, LBS Road, Kurla (West), Mumbai – 400070

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report as required under the SEBI circular CIR/CFD/CMD1/27 /2019 dated February 8,2019

SYM: PATBACK

This is to inform you that we have submitted Annual Secretarial Compliance Report as specified under Regulation **24A of SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018**

Kindly acknowledge the receipt and oblige.

Thanking you
Yours Faithfully

For **Patback Business Limited**

Pawan Kumar Mittal
Director
DIN: 00749265



G AAKASH & ASSOCIATES

Company Secretaries

SECRETARIAL COMPLIANCE REPORT

OF PATBACK BUSINESS LIMITED FOR THE YEAR ENDED 2024-25

We have examined:

- (a) all the documents and records made available to us and explanation provided by **Patback Business 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 **2024-25** 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) Regulations, 2014;*
- (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	<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)</p>	YES	None
2	<p><u>Adoption and timely update of the Policies:</u></p> <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	<p><u>Maintenance and disclosures on Website:</u></p> <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.	YES	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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- 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.	Deviations	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 Company Secretary	Management Response	Remark
1.	Regulation 160 of SEBI (ICDR) Regulations read with Regulation 28(1) of SEBI (LODR) Regulations which relates to late submission for making application for in-principal approval to stock exchange within stipulated time	Regulation 160 of SEBI (ICDR) Regulations read with Regulation 28(1) of SEBI (LODR) Regulations	Late Filing of application for in-principal approval to stock exchange	A fine of Rs. 59,000/- was imposed by MSEI	Late Submission	We have been informed by the Company that a fine of Rs. 59,000/- was imposed by MSEI for violation of Regulation 160 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) (Amendment) Regulations read with Regulation 28(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [which relates to late submission for making application for in-principal approval to the stock exchange within stipulated time]	Rs. 59,000/-	Late Submission	The Management has paid the fine with MSEI	NA

Place: Haryana
Date: 13.05.2025

For G Aakash & Associates
Company Secretaries



Aakash Goel
(Prop.)

M. No.: A57213

CP No.: 21629

UDIN: A057213G000331608