

# Nupur Recyclers Limited

(Formerly known as Nupur Recyclers Private Limited)

CIN - L37100DL2019PLC344788

**Date: May 28, 2025**

To

The Manager- Listing Compliance  
National Stock Exchange India Limited  
Exchange Plaza, Plot No. C/1, G Block,  
Bandra Kurla complex, Bandra (E), Mumbai 400051

**Scrip Code: NRL; ISIN: INE0JM501013**

**Subject: Annual Secretarial Compliance Report for the year ended March 31, 2025**

**Ref: Regulation 24 (A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

**Dear Sir/Madam**

Please find enclosed herewith the Annual Secretarial Compliance Report issued by M/s Arun Goel & Associates, for the financial year ended on March 31, 2025 as per Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Kindly take the above on your record and acknowledge the same.

Thanking You

**FOR NUPUR RECYCLERS LIMITED**

**Shilpa**  
**Verma**  
Digitally signed  
by Shilpa Verma  
Date: 2025.05.28  
15:21:46 +05'30'

**Shilpa Verma**  
**Company Secretary & Compliance Officer**  
**M. No: F10105**

compliance@nupurrecyclers.com 

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www.nupurrecyclers.com 

Reg. Off. - Plot No. 5, KH 12/8, 9 KH - 12, Arjun Gali,  
New Mandoli, Industrial Area, East Delhi - 110093 

Corporate Off. - Plot 03, F.I.E., Patparganj, New Delhi - 110092 

# ARUN GOEL & ASSOCIATES

COMPANY SECRETARIES

Office: 50, Ashoka Part-3, Faridabad, Haryana – 121003

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## SECRETARIAL COMPLIANCE REPORT OF NUPUR RECYCLERS LIMITED FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2025

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,

**The Members**

**Nupur Recyclers Limited,**

Plot No. 5, G/F, Kh No. 12/8 & 12/9 Kh-12,

Arjun Gali, New Mandoli Industrial Area,

Near Shri Ram Bal Bharti Public School,

Delhi-110093

We, M/s Arun Goel & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **Nupur Recyclers 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 31st March, 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:



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**Mobile: - 09810165074, 08802444222**

**Email: -arun\_goel89@yahoo.com; csarungoel@gmail.com**

- (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 Exchange Board of India (Buyback of Securities) Regulations, 2018 (*Not Applicable during the review period*);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (*Not Applicable during the review period*);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (*Not Applicable during the review period*);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (*Not Applicable during the review period*);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and exchange Board of India (Registrar to an issue and share transfer Agents) Regulations, 1993;
- (j) Securities and exchange Board of India (depositories and participants) regulations, 2018; and circulars/ guidelines issued thereunder;

and based on the above examination ,we hereby report that, during the Review Period the compliance status of the listed entity is appended below;

- (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/ guideline including specific clause)	Regulation/ Circular No	Deviations	Action Taken By	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
NIL/NA										

- (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 (PCS) in the previous reports)	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
NIL/NA						

(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	<p><b>Secretarial Standards:</b></p> <p>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) as notified by the Central Government under Section 118(10) of the Companies Act, 2013 and Mandatorily applicable.</p>	Yes	-
2.	<p><b>Adoption and timely updation of the Policies:</b></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 has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</p>	Yes  Yes	-  -
3	<p><b>Maintenance and disclosures on Website:</b></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</p>	Yes  Yes	-  -



	under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website.	Yes	
4	<b>Disqualification of Director:</b>  None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	-
5	<b>To examine details related to Subsidiaries of listed entities:</b>  Identification of material subsidiary Companies  Requirements with respect to disclosure of material as well as other subsidiaries	Yes  Yes	-  -
6	<b>Preservation of Documents:</b>  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	<b>Performance Evaluation:</b>  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	<b>Related Party Transactions:</b>  The listed entity has obtained prior approval of Audit Committee for all Related party transactions.  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	-  As prior approval of Audit Committee obtained
9	<b>Disclosure of events or information:</b>  The listed entity has provided all the required disclosure(s)	Yes	



	under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.		
10	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  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 (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Yes	No actions were taken against the listed entity /promoters / directors / subsidiaries
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b>  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	There was no resignation of statutory auditors from the Company or its material subsidiary
13.	<b>Additional Non-compliances, if any:</b>  No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	No any additional Non-Compliance were observed

We Further, report that the listed Entity is in compliance/not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. Not Applicable

**Assumptions & Limitation of scope and Review:**

Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.

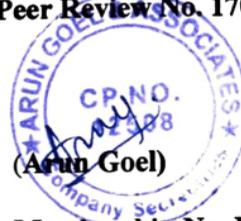


Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.

We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.

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.

**For M/s Arun Goel & Associates,  
Company Secretaries  
ICSI Unique Code: S2013HR228900  
Firm Peer Review No. 1703/2022**



**Date** : 27<sup>th</sup> May, 2025  
**Place** : Faridabad  
**UDIN** : F0098929000452158

**Membership No. F 9892  
COP. No: 12508**