Kalyan Capitals Limited

(formerly known as Akashdeep Metal Industries Limited)

CIN: L28998DL1983PLC017150

Corporate Office: 3rd Floor,56/33, Site IV
Industrial Area Sahibabad,
Ghaziabad-201010, Uttar Pradesh
Tel: +91-120-4543708
Email: info@kalyancapitals.com
Website: www.kalyancapitals.com

May 30, 2026

To,
The Manager - Listing
Department of Corporate Services
BSE Limited P J Towers,
Dalal Street, Fort,
Mumbai – 400001

Scrip Code: 538778

Sub: Annual Secretarial Compliance Report for Financial Year 2025-26

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with relevant SEBI circulars issued from time to time, please find enclosed herewith Annual Secretarial Compliance Report for the financial year 2025-26.

The above document is available on the Company's website at www.kalyancapitals.com.

This is for your information and records.

Thanking You

For KALYAN CAPITALS LIMITED

SUNIL KUMAR MALIK
Digitally signed by SUNIL KUMAR MALIK
Date: 2026.05.30 21:10:07 +05'30'

(Sunil Kumar Malik)
Director
DIN: 00143453

SECRETARIAL COMPLIANCE REPORT KALYAN CAPITALS LIMITED (CIN-L28998DL1983PLC017150) FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2026.

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by KALYAN CAPITALS LIMITED (hereinafter referred as 'the listed entity'), having its Registered Office at PLAZA-3 P3-204, 2ND FLOOR, CENTRAL SQAURE, 20 MANOHAR LAL KHURANA MARG, BARA HINDU RAO, DELHI SADAR BAZAR, NORTH DELHI, INDIA, 110006. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2026 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I, CS Hemant Kumar Sajnani Designated Partner of HKS & Associates LLP, have examined:

a) All the documents and records made available to us and explanation provided by KALYAN CAPITALS 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 31st March, 2026 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 there under and the regulations, circulars, guidelines issued there under by the 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;

(a) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not applicable for the period under review**

(b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations,2011;

(c) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not applicable for the period under review**

(d) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not applicable for the period under review**

(e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021. **Not applicable for the period under review.**

(f) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 except for certain procedural delays in recording entries in the Structured Digital Database (SDD) software;

(g) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

(h) Other regulations as applicable.

(i) And circulars/ guidelines issued thereunder.

Further based on the above examination, I hereby report that during the Review Period:

(a) (**) Kalyan Capitals Limited, 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*

1.	*Regulation 31* *Non-submission of shareholding pattern within the period prescribed*	*Regulation 31 of* SEBI (Listing Obligations and disclosure requirements) Regulations, 2015	*Non-submission of shareholding pattern within the period prescribed*	*Bombay Stock Exchange*	BSE has imposed fine of Rs.4720 /-(including GST) for non-compliance of Regulation 31	*Non-submission of shareholding pattern within the period prescribed*	Rs.4720 /-/-(including GST)	BSE has imposed fine of Rs.4720/-(including GST) for non-compliance of Regulation 31 the same has been deposited by the Company on 03/03/2026	The Amount has been deposited on 03/03/2026	

(b) Kalyan Capitals Limited, 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 on 31st March, 2025*	*Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)*	*Details of violation /deviation 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						

I 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.	**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	No
2.	**Adoption and timely updation of the Policies:** • 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 Yes	No No
3.	**Maintenance and disclosures on Website:** • 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 redirects to the relevant document(s)/section of the website.	Yes Yes Yes	No No No
4.	**Disqualification of Director(s):** • None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act,2013 as confirmed by the listed entity	Yes	No
5.	**Details related to subsidiaries of listed entities have been examined w.r.t.:** (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	Yes Yes	No No

6.	**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.	Yes	No
7.	**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.	Yes	No
8.	**Related Party Transactions:** (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 No
9.	**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.	Yes	No
10.	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	No
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	BSE has imposed fine of Rs.4720/-(including GST) for non- compliance of Regulation 31 the same has been deposited by the Company on 03/03/2026	The Amount has been deposited on 03/03/2026

12.	**Resignation of statutory auditors from the listed entity or its material subsidiaries:** 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	No
13.	Additional non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	NA	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.

For HKS & Associates LLP

Date: 30.05.2026
Place: Kanpur

Hemant Kumar Sajnani

Digitally signed by Hemant Kumar Sajnani
Date: 2026.05.30 17:45:25 +05'30'

(CS Hemant Kumar Sajnani)
Designated Partner
C.P. No. – 14214
P.R. CODE: 6731/2025
UDIN: F007348H000557755