



May 22, 2026

To National Stock Exchange of India Limited Exchange Plaza, 5th Floor, Plot No. C/1, G Block, Bandra – Kurla Complex, Bandra (E), Mumbai – 400 051 SYMBOL: ELLEN	To BSE Limited New Trading Ring, 2nd Floor, Rotunda Building, P.J. Towers, Dalal Street, Mumbai – 400 001 SCRIP CODE: 544421
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Sub: Submission of Annual Secretarial Compliance Report pursuant to Regulation 24A (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Madam,

We enclose herewith the Annual Secretarial Compliance Report dated May 21, 2026 for the Financial Year ended March 31, 2026 issued by M/s Shikha G & Associates, Company Secretaries, pursuant to Regulation 24A (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The same is also being made available on the website of the Company at <https://ellenbarrie.com/>

We request you to kindly take the above on record.

Thanking You.
Yours faithfully,

For Ellenbarrie Industrial Gases Limited

Aditya Keshri
Company Secretary and Compliance Officer
Membership No.: A73390



**SHIKHA G &
ASSOCIATES**
COMPANY SECRETARIES

DIAMOND HERITAGE
6TH FLOOR, UNIT: 603
16, STRAND ROAD
KOLKATA: 700 001
(+91) 78900 10012
shikhagupta.cs@gmail.com

To
The Board of Directors
Ellenbarrie Industrial Gases Limited
CIN- L24112WB1973PLC029102
3A Ripon Street,
Kolkata-700016

Subject: **Annual Secretarial Compliance Report for the Financial Year 2025-26**

Dear Sirs/Madam,

I have been engaged by (hereinafter referred to as "the Company"), bearing CIN: L24112WB1973PLC029102 and whose equity shares are listed on BSE Limited and NSE Limited to conduct an audit in terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI LODR Regulations"), read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, and to issue the Annual Secretarial Compliance Report thereon.

The responsibility for compliance with the provisions of all applicable Securities and Exchange Board of India ("SEBI") Regulations, circulars and guidelines issued thereunder rests with the management of the Company. This responsibility includes the design, implementation and maintenance of adequate internal control systems and procedures to ensure compliance with the applicable laws, regulations, circulars and guidelines.

My responsibility is to conduct the audit and express an opinion on the compliances by the Company with the applicable provisions of SEBI Regulations and circulars/guidelines issued thereunder.

The audit was conducted in accordance with the Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India. The audit involved examination of records and documents maintained by the Company and such other verification procedures as considered necessary and adequate for the purpose of issuing the Annual Secretarial Compliance Report.

The Annual Secretarial Compliance Report for the financial year ended 31st March, 2026 is enclosed herewith.

For Shikha G & Associates
Company Secretaries
Firm Regn No.- S2023WB921300
Peer Review Certificate No. 7216/2025

Shikha Gupta

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Shikha Gupta
Proprietor
CP No. 26610
FCS: 7666

UDIN: F007666H000430968
Dated: 21.05.2026
Place: Kolkata

**ANNUAL SECRETARIAL COMPLIANCE REPORT
OF
ELLENBARRIE INDUSTRIAL GASES LIMITED
(CIN - L24112WB1973PLC029102)**

**For the Financial Year Ended 31st March, 2026
{Pursuant to Regulation 24(A) of the SEBI
(Listing Obligations and Disclosure Requirements) Regulations, 2015}**

We, Shikha G & Associates, Company Secretaries, have examined:

- a) all the documents and records made available to us and explanation provided by M/s. Ellenbarrie Industrial Gases 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, 2026 (“Review Period”) 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, include:

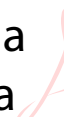
- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) Regulations, 2018;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- e) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- f) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- g) Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) (Amendment) Regulations, 2018
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars / guidelines issued thereunder.

Note: The aforesaid list of SEBI regulations is only the list of Regulations which were applicable to the Company during the year under review.

I further report that -

The Company has complied with the requirements of Structural Digital Data Base in terms of Securities & Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 including various Circulars issued by SEBI thereunder and Circular(s) issued by BSE Limited dated March 16, 2023.

Further to the matter and as advised in the BSE Notice No. 20230329-21 dated 29th March, 2023 as well as BSE Notice No. 20230410-41 dated 10th April 2023, following are the additional information which is the parts of ongoing Annual Secretarial Audit Report -

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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 India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Complied with applicable SS issued by the ICSI and notified by the Central Government.
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 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	-
3.	Maintenance and disclosures on Website: <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 Yes Yes	Web-links provided in the Corporate Governance Report under Regulation 27 (2) for the year ended 31 March 2026, were of the "Home" Page on the website of the Listed Entity and not of any specific documents section.
4.	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.	Yes	-
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	NA	The Listed Entity does not have any subsidiary.
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	-
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	-

8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes N.A.	- The transactions covered under an existing omnibus (standing) approval
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	-
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	-
11.	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.	NA	There is no such event during the year under review
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 Entity.	NA	Statutory Auditors of Listed Entity has not resigned during the review period. The Listed Entity does not have any subsidiary.
13.	Disclosure of Employee Benefit Scheme related documents: Uploaded the Employee Benefit Scheme documents, with the requisite minimum information disclosed to shareholders, on the website of the Listed Entity after obtaining shareholder approval as required under SEBI SBEB Regulations. The board of directors of the Listed Entity approved the rationale for redacting information from the documents and the justification as to how such redacted information would affect competitive position or reveal commercial secrets of the Listed Entity.	NA NA	The Listed Entity has not framed/ implemented any Scheme for Share Based Employee Benefits or Sweat Equity.
14.	Additional non-compliances, if any: No additional non-compliance observed for any SEBI regulation / circular / guidance note etc.	NA	There is no such event during the year under review

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Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	NA	No Auditor has resigned within 45 days from the end of a quarter of a financial year
2.	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/explanation sought and not provided by the management, as applicable</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>	NA	No concerns were reported by the Auditor to the Listed entity as the Auditor has not resigned
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18 th October, 2019.	NA	The Auditor has not resigned

(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	Management Response	Remarks
						N.A.				

(b) 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 Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Remarks
						N.A.				

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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 Accounts of the Listed Entity.
4. Based on the legal opinion obtained and relied upon by the Listed Entity, the Management continued to reckon materiality threshold of 10% of the annual consolidated turnover of the Listed Entity to the aggregate value of all transactions in a contract with a related party during the review period and not by aggregating value of all contracts with that related party. Accordingly, the Management of the Listed Entity is of the view that no material related party transaction was entered into by the Listed Entity, during the year under review and therefore approval of the shareholders is not required. We have been informed that the Management of the Listed Entity regularly evaluates the business and regulatory risks, including the above matter, and it recognises the related uncertainties around their ultimate outcome, the impact of which, if any, is not presently ascertainable.
5. This Report is solely for the intended purpose of compliance in terms of Regulation 24A(2) of the SEBI LODR Regulations 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 Shikha G & Associates

Company Secretaries

Firm Regn No.- S2023WB921300

Peer Review Certificate No. 7216/2025

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Shikha Gupta

Proprietor

CP No. 26610

FCS: 7666

UDIN: F007666H000430968

Dated: 21.05.2026

Place: Kolkata