



# YASHRAJ CONTAINEURS LTD.

**Registered Office :** Madhav Niwas CHSL., Flat No. B-1A, 1<sup>st</sup> floor, Natakwala Lane,  
Opp. S V Road, Borivali (West), Mumbai - 400 092. Phone : +91-22-2806 9097  
Email : yashraj\_bom@rediffmail.com # Website : www.barrelpeople.com

**CIN NO : L28120MH1993PLCO73160**



**May 27, 2026**

**To,  
The Listing Manager  
Bombay Stock Exchange Ltd,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001**

***Company Scrip Code: 530063***

**Dear Sir/Madam,**

**Sub: Submission of Annual Secretarial Compliance Report under Regulation 24(A) of SEBI (LODR) Regulation 2015, for the Year ended 31.03.2026.**

As Required, we are enclosing Annual Secretarial Compliance Report for the Year ended 31.03.2026 issued by M/s. Pranay Mandhana, ACS 60165, C.P. No. 23399, Practising Company Secretary as per Regulation 24(A) of SEBI (LODR) Regulation 2015 .

Please Take the same on your records.

Thanking you,

**Yours faithfully,  
For Yashraj Containeurs Ltd.  
(Status: Under CIRP)**

**Ajit Kumar  
Resolution Professional for Yashraj Containeurs Ltd.  
Registration No. IBBI/IPA-003/IP-N00062/2017-2018/10548**



Company Secretary (Membership No. 60165)

**Pranay Mandhana & Associates**

**Peer Review certificate no. 5613/2024**

**117 Central Avenue Road**

**Gitanjali talkies Square, Nagpur – 440 018**

## **ANNUAL SECRETARIAL COMPLIANCE REPORT**

Secretarial Compliance Report of YASHRAJ CONTAINEURS LIMITED for the financial year ended 31<sup>st</sup> March, 2026

To

The Members

**YASHRAJ CONTAINEURS LIMITED**

Madhav Niwas CHSL, Flat No B-1A, First Floor, Natakwalla Lane,

Opp S.V. Road, Borivali West, Mumbai, Maharashtra, India, 400092

**I, Pranay Mahesh Mandhana**, Practising Company Secretary, have examined

- a) All the documents and records made available to me and explanations provided by **YASHRAJ CONTAINEURS LIMITED** (CIN: L28120MH1993PLC073160)
- b) The filings and submissions made by the listed entity to the stock exchanges,
- c) Website of the listed entity, [www.barrelpeople.com](http://www.barrelpeople.com)
- d) Any other document/filing, as may be relevant, which has been relied upon to make this certification, for the year ended **31<sup>st</sup> 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 Requirements) 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 (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 Non-Convertible Securities) Regulations, 2021 - **Not Applicable during the Review Period**



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- (g) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and the circulars/guidelines issued thereunder;  
(h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

| S.No. | Particulars                                                                                                                                                                                                                                                                                                                                                         | Compliances Status (Yes/No/NA) | Observations/Remarks by PCS |
|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-----------------------------|
| 1.    | <b><u>Secretarial Standards</u></b><br><br>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                            | None                        |
| 2     | <b><u>Adoption and timely updation of the Policies</u></b><br>*All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities.<br><br>* All the policies are in conformity with SEBI Regulations and have been reviewed and updated on time as per the regulations /circulars/guidelines issued by SEBI. | YES                            | None                        |





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|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--------------------------------------------------------------------------------------------------------------------------------------------|
| 3. | <p><b><u>Maintenance and disclosures on Website</u></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 under Regulation 27(2) are accurate and specific which re-directs to the relevant documents(s)/section of the website.</p> | YES | The Company is maintaining a functional website with required disclosures, conducted as applicable, considering the ongoing CIRP framework |
| 4. | <p><b><u>Disqualification of a Director</u></b></p> <p>None of the Director (s) of the Company are disqualified under Section 164 of the Companies Act, 2013 as confirmed by the Listed Entity.</p>                                                                                                                                                                                                                  | YES | Powers of the Board of Directors remain suspended pursuant to the initiation of CIRP framework. No disqualification updates observed.      |
| 5. | <p><b><u>Details related to Subsidiaries or listed entities have been examined w.r.t.</u></b></p> <p>a) Identification of material subsidiary companies</p> <p>b) Disclosure requirement of material as well as other subsidiaries</p>                                                                                                                                                                               | NA  | The Company does not have any subsidiary company.                                                                                          |
| 6. | <p><b><u>Preservation of Documents</u></b></p> <p>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>                                                                                                                              | YES | None                                                                                                                                       |



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|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----------------------------------------------------------------------------------------------------------------------|
| 7.  | <b><u>Performance Evaluation</u></b><br><br>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 | Conducted as applicable considering the ongoing CIRP framework.                                                       |
| 8   | <b><u>Related Party Transaction</u></b><br><br>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions ; or<br><br>(b) The listed entity has provided detailed reasons along with the confirmation whether the transactions were subsequently approved/ratified/ rejected by the Audit Committee, in case no prior approval has been obtained. | YES | None                                                                                                                  |
| 9   | <b><u>Disclosure of events or information</u></b><br><br>The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder                                                                                                                                                  | YES | All relevant updates concerning CIRP milestones, financial results, and statutory declarations were disclosed to BSE. |
| 10. | <b><u>Prohibition of Insider Trading</u></b><br><br>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulation, 2015                                                                                                                                                                                                                      | YES | None                                                                                                                  |



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|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------------------------------------------------------------------------|
| 11 | <b><u>Actions taken by SEBI or Stock Exchange (s) if any</u></b><br><br>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 except as provided under Separate Paragraph herein (**Observation 1,4(i)(ii) Paragraphs herein) | YES | Refer detailed observations below.                                      |
| 12 | <b><u>Resignation of statutory auditors from the listed entity or its material</u></b><br>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.     | YES | No resignation of Statutory Auditors during the review period.          |
| 13 | <b><u>Additional Non-Compliances, if any</u></b><br><br>Additional non-compliance observed for any SEBI Regulation/circular/ guidance note etc.                                                                                                                                                                                                                                                                                                                         | NO  | No new regulatory deviations observed during the current Review Period. |

### Detailed Observations:

a) **Status under CIRP:** The Company continues to be under the Corporate Insolvency Resolution Process (CIRP) initiated under the provisions of the Insolvency and Bankruptcy Code, 2016 (IBC). Consequently, the management and operations of the company remain under the control of the Resolution Professional (RP), Mr. Ajit Kumar, and the powers of the Board of Directors stand suspended.

b) **Historical Matters:** The long-standing compounding/settlement matters with SEBI regarding past historical trades (period December 2005 to January 2006) remain under ongoing institutional follow-ups and tracking, without originating any new penal impact or structural defaults during the financial year 2025-26 under review.





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### Details of Actions Taken Against the Listed Entity:

| S.No. | Compliances Requirement (Regulation/circulars/guidelines including specific clause) | Deviations | Observations/Remarks of the Practicing Company Secretary/Company |
|-------|-------------------------------------------------------------------------------------|------------|------------------------------------------------------------------|
| -     | None                                                                                | None       | <b>No new deviations observed during the year under review.</b>  |

### Actions Taken on Observations Made in Previous Reports:

| Sr.No. | Observations of the Practicing Company Secretary in previous reports                                                                                                                                                                                                    | Action taken by the listed entity, if any                                                                                                | Comments of the Practicing Company Secretary on the actions taken by the company                                                                                                                         |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1      | SEBI Adjudication matters regarding past historical transactions, alleging Unfair Trade Practices and increase in the price of Equity Shares during the period December 2005 to January 2006, along with past non-disclosure of the disposal of promoter equity shares. | The Company, along with its Directors and other Group entities, has historically filed a Compounding (Settlement) Application with SEBI. | The matter is tracked as a legacy background issue and continues to be actively monitored by the company. No new adverse enforcement action was received during the financial year 2025-26 under review. |



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**Assumptions and 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 or the listed entity.
2. My responsibility is to certify based on our examination or relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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 Obligation 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.



Date : 22.05.2026

Place : Nagpur

UDIN : A060165H000447783

CS Pranay Mandhana  
Practising Company Secretary  
ACS No. A60165  
CP No. 23399