



# SIDH MANAGEMENT CORPORATE SERVICES LTD.

CIN NO.: L65999DL1985PLC019846

Date:-29<sup>th</sup> April, 2025

To,  
**Metropolitan Stock Exchange of India Limited (MSEI)**  
205(A), 2nd floor, Piramal Agastya Corporate Park,  
Kamani Junction, LBS Road,  
Kurla (West), Mumbai – 400070

Dear Sir,

**Sub: - Submission of Integrated filing of Governance for Quarter ended March 31, 2025**

**Dear Sir/ Madam,**

In terms of Circular no. SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31st December, 2024, submitting herewith integrated filing of Governance for quarter ended March 31, 2025.

You are requested to take the above information in your records

Yours faithfully,  
**For Sidh Management Corporate Services Limited**

SHRUTI  
JAIN

Digitally signed by  
SHRUTI JAIN  
Date: 2025.04.29  
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**Shruti Jain**  
**Company Secretary cum Compliance Officer**  
**M No. A40600**





## A - COMPLIANCE REPORT ON CORPORATE GOVERNANCE

### Non-applicability of Regulation 27(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

With reference to your email dated 15.04.2025 and SEBI Circular no. SEBI/HO/CFD/PoD2/CIR/P/0155 dated 11th November, 2024, regarding Corporate Governance filing, we are submitting herewith declaration of non – applicability of Regulation 27(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 accompanied by certificate from a Practicing Company Secretary.

Pursuant to Regulation 15 (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the compliance with the corporate governance provisions as specified in Regulations 17 to 27 and clause (b) to (i) of sub-regulation (2) of Regulation 46 and Para C, D and E of Schedule V shall not apply, in respect of the listed entity having paid up equity share capital not exceeding rupees ten crore and net worth not exceeding rupees twenty five crore, as on the last day of the Previous Financial Year.

#### **Kindly note the following figures (Audited) as on 31<sup>st</sup> March 2024:**

Paid-up share capital of the Company is Rs.2.12 Crore  
Networth of the Company is Rs.5.47 Crore

#### **Kindly note the following figures (Unaudited) as on 31<sup>st</sup> March 2025:**

Paid-up share capital of the Company is Rs.2.12 Crore  
Networth of the Company is – Yet to be audited.

We wish to inform you that Company's paid-up share capital and net worth falls below the criteria as laid down under Regulation 15(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Accordingly, Company is not required to submit the disclosure relating to the Corporate Governance under Regulation 27(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the quarter ended 31<sup>st</sup> March, 2025.

## B - INVESTOR GRIEVANCE REDRESSAL REPORT

Pursuant to Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 please find below the status of Investor Grievances and Redressal of the Company for the 04<sup>th</sup> quarter ended March 31, 2025.

INVESTOR GRIEVANCE REDRESSAL REPORT		
Sr. No.	Particulars	Remarks
1	No. of investor complaints pending at the beginning of Quarter	NIL
2	No. of investor complaints received during the Quarter	NIL
3	No. of investor complaints disposed off during the Quarter	NIL
4	No. of investor complaints those remaining unresolved at the end of the Quarter	NIL

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**C - DISCLOSURE OF ACQUISITION OF SHARES OR VOTING RIGHTS IN UNLISTED COMPANIES**

The details of acquisition of shares or voting rights in unlisted companies during the quarter in terms of sub-para 1 of para A of Part A of Schedule III are given below:

S. No.	Name of the unlisted company in which shares or voting rights have been acquired	Date of acquisition	Aggregate holding (% shares or voting rights) as at the end of the previous quarter	% shares or voting rights acquired during the quarter	Aggregate holding (% shares or voting rights) as
NIL					

**D. DISCLOSURE OF IMPOSITION OF FINE OR PENALTY**

The details of imposition of fine or penalty during the quarter in terms of sub-para 20 of para A of Part A of Schedule III are given below:

S. No.	Name of the authority	Nature and details of the action(s) taken or order(s) passed	Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority	Details of the violation(s)/contravention(s) committed or alleged to be committed	Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible
NIL					

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## E. DISCLOSURE OF UPDATES TO ONGOING TAX LITIGATIONS OR DISPUTES

The updates on tax litigations or disputes in terms of sub-para 8 of para B of Part A of Schedule III read with corresponding provisions of Annexure 18 of the Master Circular are given below:

Sr. No.	Name of the opposing party	Date of initiation of the litigation / dispute	Status of the litigation / dispute as per last disclosure	Current status of the litigation / dispute
1	Income Tax Authority	19-02-2014 for A.Y. 2012-2013	The demand of Rs. 2.30 Lakhs (inclusive of Interest of Rs. 1.18 Lakhs) is raised due to disallowance of depreciation as per Income Tax Act, 1961 while processing of Income Tax Return. Appeal filed. Order not yet received	The demand of Rs. 2.30 Lakhs (inclusive of Interest of Rs. 1.18 Lakhs) is raised due to disallowance of depreciation as per Income Tax Act, 1961 while processing of Income Tax Return. Appeal filed. Order not yet received.

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## F. DISCLOSURE OF LOANS / GUARANTEES / COMFORT LETTERS / SECURITIES ETC.

I. Disclosure of Loans / guarantees / comfort letters / securities etc.

A. Any loan or any other form of debt advanced by the listed entity directly or indirectly to:

Entity	Aggregate amount advanced during six months	Balance outstanding at the end of six months
Promoter or any other entity controlled by them	NIL	NIL
Promoter Group or any other entity controlled by them	NIL	NIL
Directors (including relatives) or any other entity controlled by them	NIL	NIL
KMPs or any other entity controlled by them	NIL	NIL

B. Any guarantee/ comfort letter (by whatever name called) provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:

Entity	Type (guarantee, comfort letter etc.)	Aggregate amount of issuance during six months	Balance outstanding at the end of six months (taking into account any invocation)
Promoter or any other entity controlled by them	NIL	NIL	NIL
Promoter Group or any other entity controlled by them	NIL	NIL	NIL
Directors (including relatives) or any other entity controlled by them	NIL	NIL	NIL
KMPs or any other entity controlled by them	NIL	NIL	NIL

**DINESH SHARMA** Digitally signed by  
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C. Any security provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:

Entity	Type of security (cash, shares etc.)	Aggregate value of security provided during six months	Balance outstanding at the end of six months
Promoter or any other entity controlled by them	NIL	NIL	NIL
Promoter Group or any other entity controlled by them	NIL	NIL	NIL
Directors (including relatives) or any other entity controlled by them	NIL	NIL	NIL
KMPs or any other entity controlled by them	NIL	NIL	NIL

## II. Affirmations:

All loans (or other form of debt), guarantees, comfort letters (by whatever name called) or securities in connection with any loan(s) (or other form of debt) given directly or indirectly by the listed entity to promoter(s), promoter group, director(s) (including their relatives), key managerial personnel (including their relatives) or any entity controlled by them are in the economic interest of the company.

DINESH SHARMA  
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**Dinesh Sharma**  
**MD and CEO**  
**DIN: 07526355**  
**Date : 29/04/2025**



## Note:

- These disclosures shall exclude any loan (or other form of debt), guarantee / comfort letter (by whatever name called) or security provided in connection with any loan or any other form of debt;
  - by a government company to/ for the Government or government company
  - by the listed entity to/for its subsidiary [and joint-venture company] whose accounts are consolidated with the listed entity.
  - by a banking company or an insurance company ; and
  - by the listed entity to its employees or directors as a part of the service conditions
- If the Listed Entity would like to provide any other information, the same may be indicated as Para D in the above table.



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**G. AFFIRMATIONS ON COMPLIANCE REQUIREMENTS FOR AGM (applicable only for the first half-year filing i.e., 2nd quarter) - Not Applicable for quarter ended March 2025.**

**H. WEBSITE AFFIRMATIONS (applicable only for Annual Filing i.e., 4th quarter)**

<b>I. Disclosure on website in terms of Listing Regulations</b>		
<b>Item</b>	<b>Compliance status (Yes/No/NA) refer note below</b>	<b>Web address</b>
Details of business	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Memorandum of Association and Articles of Association	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Brief profile of board of directors including directorship and full-time positions in body corporates	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Terms and conditions of appointment of independent directors	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Composition of various committees of board of directors	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Code of conduct of board of directors and senior management personnel	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Details of establishment of vigil mechanism/ Whistle Blower policy	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Criteria of making payments to non-executive directors	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Policy on dealing with related party transactions	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Policy for determining 'material' subsidiaries	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Details of familiarization programmes imparted to independent directors	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>

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# SIDH MANAGEMENT CORPORATE SERVICES LTD.

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Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
email address for grievance redressal and other relevant details	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Financial results	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Shareholding pattern	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Details of agreements entered into with the media companies and/or their associates	N.A.	
Schedule of analyst or institutional investors meet and presentation made by the listed by the listed entity to analyst or institutional investors simultaneously with submission to Stock Exchange	N.A.	
Audio recordings, video recordings, if any, and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means	N.A.	
New name and the old name of the listed entity	N.A.	
Advertisement as per regulation 47(1)	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Credit rating or revision in credit rating obtained	N.A.	
Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year	N.A.	

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# SIDH MANAGEMENT CORPORATE SERVICES LTD.

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Secretarial Compliance Report	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Materiality Policy as per Regulation 30	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Disclosure of contact details of KMP who are authorized for the purpose of determining materiality as required under Reg 30(5)	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Disclosure under Reg 30(8)	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Statement of Deviations(s) or variations as specified in Reg 32	NA	
Dividend distribution policy as per Regulation 43A ( as Applicable)	N.A.	
Annual Return under Section 92 of the Companies Act 2013	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Employee Benefit scheme documents framed in terms of SEBI (SBEB) Regulations, 2021	NA	
Whether Company has provided information under separate section on its website as per Regulation 46(2)	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>
Compliance with regulations 46(3) with respect to accuracy of disclosure on the website and timely updating	Yes	<a href="https://www.sidhmanagement.in/SEBI-LODR.html">https://www.sidhmanagement.in/SEBI-LODR.html</a>

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## I. AFFIRMATIONS W.R.T. COMPLIANCE WITH CORPORATE GOVERNANCE PROVISIONS (applicable only for Annual Filing i.e., 4th quarter)

II Annual Affirmations		
Particulars	Regulation Number	Compliance status (Yes/No/NA) <small>refer note below</small>
Independent director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility'	16(1)(b) & 25(6)	Yes
Board composition	17(1) , 17(1A)& 17(1 C) , 17 (1 D) & 17 (1E)	Yes
Meeting of Board of directors	17(2)	Yes
Quorum of Board meeting	17(2A)	Yes
Review of Compliance Reports	17(3)	Yes
Plans for orderly succession for appointments	17(4)	Yes
Code of Conduct	17(5)	Yes
Fees/compensation	17(6)	Yes
Minimum Information	17(7)	Yes
Compliance Certificate	17(8)	Yes
Risk Assessment & Management	17(9)	Yes
Performance Evaluation of Independent Directors	17(10)	Yes
Recommendation of the Board	17(11)	Yes
Maximum numbers of Directorship	17(A)	Yes
Composition of Audit Committee	18(1)	Yes
Meeting of Audit Committee	18(2)	Yes
Role of Audit Committee	18(3)	Yes
Composition of nomination & remuneration committee	19(1) & (2)	Yes
Quorum for Nomination and Remuneration Committee	19(2A)	Yes
Meeting of Nomination and Remuneration Committee	19(3A)	Yes
Role of Nomination and Remuneration Committee	19(4)	Yes
Composition of Stakeholder Relationship Committee	20(1), (2) & 20(2A)	Yes
Meeting of Stakeholder Committee Meeting	20(3A)	Yes
Role of Stakeholder Relationship Committee	20(4)	Yes
Composition and role of risk management committee	21(1),(2),(3),(4)	Yes
Meeting of Risk Management Committee Meeting	21(3A)	Yes
Quorum of Risk Management Committee Meeting	21(3B)	Yes

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# SIDH MANAGEMENT CORPORATE SERVICES LTD.

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Gap between the meetings of the Risk management Committee	21(3 C )	Yes
Vigil Mechanism	22	Yes
Policy for related party Transaction	23(1), (1A),(5),(6) & (8)	Yes
Prior or Omnibus approval of Audit Committee for all related party transactions	23(2), (3)	Yes
Approval for material related party transactions	23(4)	N.A.
Disclosure of related Party Transaction on consolidated basis	23(9)	Yes
Composition of Board of Directors of unlisted material Subsidiary	24(1)	N.A.
Other Corporate Governance requirements with respect to subsidiary of listed entity	24(2),(3),(4),(5) & (6)	N.A.
Annual Secretarial Compliance Report	24(A)	Yes
Alternate Director to Independent Director	25(1)	N.A.
Maximum Directorship & Tenure	25 (2)	Yes
Appointment , Re-appointment or removal of an Independent Director through Special Resolution or the alternate mechanism	25(2A)	Yes
Meeting of independent directors	25(3) & (4)	Yes
Familiarization of independent directors	25(7)	Yes
Declaration From Independent Director	25(8) & (9)	Yes
D & O Insurance for Independent Director	25(10)	N.A.
Confirmation with respect to appointment of Independent Directors who resigned from the listed entity	25(11)	Yes
Memberships in Committees	26(1)	Yes
Affirmation with compliance to code of conduct from members of Board of Directors and Senior management personnel	26(3)	Yes
Disclosure of Shareholding by Non-Executive Directors	26(4)	Yes
Policy with respect to Obligations of directors and senior management	26(2) & 26(5)	Yes
Approval of Board and shareholders for compensation or profit sharing in connection with dealings in the securities of the listed entity	26(6)	NA

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# SIDH MANAGEMENT CORPORATE SERVICES LTD.

CIN NO.: L65999DL1985PLC019846

Vacancies in respect Key Managerial Personnel	26A(1)& 26A(2)	NA
<b>Note</b> 1 In the column "Compliance Status", compliance or non-compliance may be indicated by Yes/No/N.A. For example, if the Board has been composed in accordance with the requirements of Listing Regulations, "Yes" may be indicated. Similarly, in case the Listed Entity has no related party transactions, the words "N.A." may be indicated. 2 If status is "No" details of non-compliance may be given here. 3 If the Listed Entity would like to provide any other information the same may be indicated here.		
<b>III Affirmations:</b> The Listed Entity has approved Material Subsidiary Policy and the Corporate Governance requirements with respect to subsidiary of Listed Entity have been complied. Not Applicable		
Yours faithfully, <b>For Sidh Management Corporate Services Limited</b>  SHRUTI JAIN <small>Digitally signed by SHRUTI JAIN Date: 2025.04.29 17:53:14 +05'30'</small>  Shruti Jain Company Secretary cum Compliance Officer M No. A40600		
		

**CERTIFICATE FROM PRACTICING COMPANY SECRETARY  
(For Non-Applicability of Regulation 27(2) of SEBI (LODR) Regulations, 2015)**

To  
The Board of Directors  
Sidh Management Corporate Services Limited  
CIN: L65999DL1985PLC019846  
E - 253, Saraswati Kunj Apartments, 25,  
I.P. Extension, Patparganj,  
New Delhi - 110092

Subject: **Certificate for Non-Applicability of Corporate Governance Provisions under Regulation 27(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the 4<sup>th</sup> quarter and year ended on 31st March, 2025**

This is to certify that M/s Sidh Management Corporate Services Limited, a Company having its equity shares listed on Metropolitan Stock Exchange of India Limited, is claiming exemption under Regulation 15(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

As per the provisions of Regulation 15(2) of the SEBI (LODR) Regulations, 2015, the compliance with the corporate governance provisions including Regulation 27(2) shall not apply to the listed entity having:

- Paid-up equity share capital not exceeding Rs. 10 Crores, and
- Net worth not exceeding Rs. 25 Crores,  
as on the last day of the previous financial year.

Based on the records, information, and representations provided by the management of the Company, and my verification of the same, I hereby certify that:

The Paid-up Equity Share Capital of the Company as on 31st March, 2024 is Rs. 2.12 Crores; and  
The Net Worth of the Company as on 31st March, 2024 is Rs. 5.47 Crores.

Hence, the Company qualifies for exemption under Regulation 15(2) and is not required to comply with the provisions of Regulation 27(2) of SEBI (LODR) Regulations, 2015 for the quarter/year ended 31st March, 2025.

**For Veenit Pal & Associates**  
Company Secretaries

  
Veenit Pal  
(Proprietor)  
C.P. No. : 13149  
ACS : 25565



Place : Mumbai  
Date : 21<sup>st</sup> April, 2025

UDIN : A025565G000159701  
Peer Review No. 1433/2021