



May 27, 2026

Listing Compliance,
BSE Limited
P. J. Towers,
Dalal Street,
Mumbai – 400 001
(Scrip Code: 526881)

Listing Compliance.,
National Stock Exchange of India Limited
Exchange Plaza,
Bandra Kurla Complex,
Bandra (E), Mumbai – 400 051
(Scrip Code: 63MOONS)

Dear Sir(s),

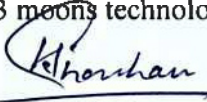
Sub: Annual Secretarial Compliance Report for the financial year ended 31st March 2026.

Pursuant to Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 read with the applicable circulars, please find enclosed herewith the Annual Secretarial Compliance Report for the F.Y. ended 31st March 2026.

Kindly acknowledge receipt and take the above information on your record.

Thanking You,

Yours faithfully,
For 63 moons technologies limited


Hariraj Chouhan
Sr. VP & Company Secretary



Encl: a/a

63 moons technologies limited

Corporate Office: FT Tower, CTS No. 256 & 257, Suren Road, Chakala, Andheri (East), Mumbai - 400 093, India
T: +91-22-6686 8010 | F: +91-22-6686 8050 | E: info@63moons.com | W: www.63moons.com
Registered Office: Shakti Tower-II, 4th floor, Premises-J, 766, Anna Salai, Chennai - 600002.
T: +91 44 4395 0850 | F: +91 44 4395 0899 | CIN No.: L29142TN1988PLC015586

**SECRETARIAL COMPLIANCE REPORT OF 63 MOONS TECHNOLOGIES LIMITED
FOR THE FINANCIAL YEAR ENDED 31ST MARCH 2026**

We, BNP & Associates, Secretarial Auditors of the listed entity, have examined:

- (a) all the relevant documents and records made available to us and the explanations provided by the listed entity, for the purposes of our audit;
- (b) the filings/ submissions made by the listed entity to the Stock Exchange(s);
- (c) Website of the listed entity;
- (d) any other documents/ filings, as may be relevant, which have been relied upon to make this Report,

for the financial year ended 31st March 2026 ("Review Period") in respect of the 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:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") as amended from time to time;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (to the extent applicable);
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; The Company has also maintained a Structured Digital Database ("SDD") pursuant to the requirements of regulation 3 (5) and 3 (6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; and
- (f) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2025 as amended from time to time.

and the circulars/ guidelines issued thereunder;

And based on the above examination, we hereby report that, during the Review Period:



- (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 |
|---------|--|---------------------------------|--|-----------------|--|
| (a) | (b) | (c) | (d) | (e) | (f) |
| 1. | Regulation 4(1)(c) of SEBI LODR | Regulation 4(1)(c) of SEBI LODR | The Company received formal Warning Letters from BSE and NSE dated February 20, 2026, stating that the disclosure filed on January 27, 2026, regarding MSE's trading engine is not in compliance with Regulation 4(1)(c) of SEBI LODR Regulations. | BSE and NSE | Formal Warning Letters received from BSE and NSE dated February 20, 2026 |

| Details of Violation (g) | Fine Amount (h) | Observations/Remarks of the Practicing Company Secretary (i) | Management response (j) | Remarks (k) |
|--|---|---|--|--|
| Regulation 4(1)(c) of SEBI LODR Regulations (Principles governing disclosures) | No monetary fine was levied by the Exchanges. | We are informed that the Company issued clarification on the matter on February 3, 2026 and noted the warnings to avoid such incidents in future. | The Company issued clarification on the matter on February 3, 2026 and the Board of Directors noted the warning letters at their meeting held on May 18, 2026. | The Company submitted clarifying statements on February 3, 2026, and filed formal acknowledgments to both stock exchanges on February 23 and 24, 2026. |



(b) The Listed Entity has taken the following action 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 | 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 |
|---------|--|---|---|--|--|--|
| (a) | (b) | (c) | (d) | (e) | (f) | (g) |
| 1. | As per ASCR issued for the year ended 31 st March, 2025. | For the year ended 31 st March, 2025 | In respect of providing STP Gate Services to 63 moons. | On 3rd December, 2020, SEBI has passed an order rejecting the approval for providing STP Gate Services to 63 moons on the basis of 'Fit & Proper' order passed by FMC 7 years ago. | SEBI | As on March 31, 2026 We are informed by the Company that subsequent to SEBI order dated 3.12.2020, the Company has lost majority of its business from STP Gate. Hence, the Company decided to sell its STP Gate Business to a third party who fulfils the criteria laid down by SEBI. Approval of shareholders was sought for sale of STP Gate Business Undertaking vide postal ballot Notice dated 25.10.2024. The results for the same were announced on 29.11.2024 and the special resolution was passed by requisite majority. Pursuant to the postal ballot approval obtained from shareholders, the Company has completed the sale and transfer of its STP-Gate Business Undertaking to M/s Synapsewave Innovations Private Limited, on a slump sale basis. All the closing formalities and |

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| | | | | | | Conditions Precedent were fulfilled, and the said transaction was completed on September 09, 2025. |
|--|--|--|--|--|--|--|

i. 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. | <u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI). | Yes | None |
| 2. | <u>Adoption and timely Updation of the Policies:</u> <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entity.All the policies are in conformity with SEBI Regulations and has been reviewed and timely updated on time, as per the regulations/circulars/guidelines issued by SEBI. | Yes | None |
| 3. | <u>Maintenance and disclosure on Website:</u> <ul style="list-style-type: none">The Listed Entity is maintaining a functioning websiteTimely dissemination of the documents/information under a separate section on the websiteWeb-links provide 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.We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the SEBI LODR. | Yes | None |
| 4. | <u>Disqualification of Directors:</u> None of the Director(s) of the Company are disqualified under Section 164 of the Companies Act, 2013. | Yes | We have verified the same on the basis of the declarations furnished by Directors, details of filing available on MCA website and list |

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|-----|---|-----------------------------|--|
| | | | of disqualified directors as uploaded by the Registrar of Companies from time to time. |
| 5. | <p><u>Details related to Subsidiaries of the listed entity have been examined w.r.t.</u></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure Requirements of material as well as other subsidiaries</p> | <p>a) Yes</p> <p>b) Yes</p> | The listed entity had a material step-down subsidiary viz. Ticker Data Limited. |
| 6. | <p><u>Preservation of Documents:</u></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.</p> | Yes | None |
| 7. | <p><u>Performance Evaluation:</u></p> <p>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.</p> | Yes | None |
| 8. | <p><u>Related Party Transactions:</u></p> <p>(a) The Listed Entity has obtained prior approval of Audit Committee for all Related party transactions.</p> <p>(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.</p> | <p>a) Yes</p> <p>b) NA</p> | None |
| 9. | <p><u>Disclosure of events or information:</u></p> <p>The Listed Entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR within the time limits prescribed thereunder.</p> | Yes | None |
| 10. | <p><u>Prohibition of Insider Trading</u></p> <p>The Listed Entity is in compliance with Regulations 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> | Yes | None |
| 11. | <p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> | NA | No action was taken by SEBI or by the Stock Exchanges during the Review Period including under |

| | | | |
|-----|---|----|--|
| | 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 Regulations and circulars/ guidelines issued thereunder. | | the Standard Operating Procedures issued by SEBI through various circulars except during the review period, 63 moons received parallel Warning Letters dated Feb 20, 2026, from NSE and BSE regarding a disclosure filed on January 27, 2026, which was not in compliance with Reg 4(1)(c) of SEBI (LODR) 2015. The Company issued clarification and subsequently noted these warnings at the meeting of the Board of Directors to avoid such incidents in future. No monetary penalties were imposed. |
| 12. | <u>Resignation of Statutory auditors from the listed entity or its material subsidiaries:</u> 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 | None |
| 13. | <u>Additional non-compliances, if any:</u> No any additional non-compliance observed for any SEBI regulation/circular/guidance note etc. | NA | No non-compliance has been observed during the Review Period. |

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, is the responsibility of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of an opinion.
3. We 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 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 BNP & Associates
Company Secretaries**
[Firm Regn. No. P2014MH037400]
[PR No.: - 7353/2025]

K. Venkataraman

Venkataraman Krishnan
Partner
ACS No.: 8897/ COP No.: 12459
UDIN: A008897H000490213

Date: 26th May, 2026
Place: Mumbai