



Julien Agro
Infratech Limited

May 30, 2025

To
The Manager
Listing Department
BSE Limited
P. J. Towers, 1st Floor
Dalal Street
Mumbai – 400 001

Scrip Code in BSE: 536073

Sub : Annual Secretarial Compliance Report for the financial year ended March 31, 2025

Dear Sir/Madam

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, BSE Notice No. 20230316-14 dated March 16, 2023, please find enclosed herewith Annual Secretarial Compliance Report of the Company dated May 29, 2025 issued by Mr. Hemant Sharma, Proprietor of M/s. Hemant Sharma & Associates, Practicing Company Secretaries, for the financial year 2024-25.

This is for your information and records.

Thanking you,

Yours faithfully,

For Julien Agro Infratech Limited


Puja Jain
(Company Secretary)
Membership No. 38570

Encl : As Above

JULIEN AGRO INFRATECH LIMITED
(Formerly : SILVERPOINT INFRATECH LIMITED)

85, Bentick Street, 5th Floor, Yashoda Chamber, Room No. 6, Kolkata- 700 001
Tel . 91.8232062881, Website : www.julieninfra.com, E-mail : info@julieninfra.com, CIN : L28219WB1997PLC083457

Secretarial Compliance Report of
JULIEN AGRO INFRATECH LIMITED
(Formerly Known as "Silverpoint Infratech Limited")
For the Financial Year ended March 31, 2025

I, Mr. Hemant Sharma, Proprietor of M/s. Hemant Sharma & Associates, Company Secretaries in Practice, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **JULIEN AGRO INFRATECH LIMITED**, having CIN: L28219WB1997PLC083457 (hereinafter referred as 'the listed entity') and having its Registered Office at 85, Bentick Street, 5th Floor, "Yashoda Chamber", Room No. 6, Kolkata – 700001, West Bengal. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my 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 in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2025 ('Review Period'), complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I have examined:

- (a) all the documents and records made available to us and explanation provided by **JULIEN AGRO INFRATECH 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 year ended March 31, 2025 ("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");

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Date: 2025.05.29
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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 Requirements) 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 Debt Securities) Regulations, 2008; **(Not applicable during the review period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable during the review period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other regulations as applicable

and circulars/ guidelines issued thereunder;

and based on the above examination, I 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	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	The Company has taken action as per SEBI (LODR) Regulation, 2015	As per the SEBI SOP Circular	There are no such deviation.	BSE	NA	Non Compliance of Regulation 34, 6(1), 18(1), 19(1)/19(2) under SEBI (LODR) Regulation, 2015	3,16,240	NA	The Company and his Management take the action.	Fine paid by Company

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guide-lines 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
NONE										

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

Sl. 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	None
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	The Company has updated its policies and Code with the approval of Board of Director dated April 08, 2024 as per updated regulations/circulars/guidelines issued by SEBI pursuant to name change of the Company
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 re- directs to the relevant document(s)/section of the website	Yes	The Company has updated its new Website "www.julieninfra.com" pursuant to name change of the Company
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	None
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: Identification of material subsidiary companies Disclosure requirement of material as well as other subsidiaries	NA	None

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	None
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	None
8.	Related Party Transactions: The listed entity has obtained prior approval of Audit Committee for all related party transactions.	Yes	None
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	None
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	None
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 except as provided above in paragraph (a) (**).	No	Fine of Rs. 3,16,240/- was imposed by BSE for Non-Compliance of Regulation 34, 6(1), 18(1), 19(1)/19(2) under SEBI (LODR) Regulation, 2015 and the Company has paid the Fine
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: There was no instance of resignation of Statutory Auditor during the review period.	N.A.	None
13.	Additional non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	N.A.	None

We hereby further report that the following events occurred during the Review Period which are appended as below:

- (i) The payment of the First interim dividend of 0.05 (Five Paise only) per equity shares for the F.Y. 2024-25 on the total issued, subscribed and paid-up 19,789,000 Equity shares of the nominal value of Rs. 10/- each.
- (ii) Members of the Company be and is hereby accorded for sub-division/ split of the existing equity shares of the Company, such that each equity share having face value of Rs. 10/- (Rupees Ten only) each fully paid-up, be sub-divided/split into such number of equity shares having face value of Rs. 5/- (Rupees Five only) each fully paid-up, ranking pari-passu.
- (iii) The payment of the 2nd interim dividend of Rs. 0.05 (Five Paise only) per equity shares for the F.Y. 2024-25 on the total issued, subscribed and paid-up 3,95,78,000 Equity shares of the nominal value of Rs. 5/- each.
- (iv) The Company has issue and allotted, by way of preferential issue on a private placement basis, in one or more tranches, in compliance with ICDR Regulations, up to an aggregate of 2,00,00,000 (Two Crores) numbers of Fully Convertible Equity Warrants (hereinafter referred to as "Convertible Warrants") at an exercise price of Rs. 13.50/- (Rupees Thirteen and Fifty Paise Only) per underlying Equity share of the Face Value of Rs. 5/- (Rupees Five each) (with a premium of Rs. 8.50/-) per share which is a price higher than the price as determined in accordance with the provisions of Chapter V of SEBI (ICDR) Regulations, each convertible into 1 (One) Equity Shares of Face Value of Rs. 5/- (Rupees Five Only) each, aggregating up-to Rs. 27,00,00,000 /- (Rupees Twenty Seven Crores Only), for cash, to the person(s) belonging to Non-Promoter Group Category.

We further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of the LODR Regulations: Not Applicable

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 certify 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. 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 Hemant Sharma & Associates
Company Secretaries*

HEMANT SHARMA Digitally signed by
HEMANT SHARMA
Date: 2025.05.29
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Hemant Sharma
Proprietor

Membership No.: A-42264

COP No.: 17411

Peer Review Certificate No.: 4030 of 2023

UDIN: A042264G000481384

Date : 29-05-2025

Place: Kolkata