

# South West Pinnacle

ISO 9001: 2015 Certified Company

South West Pinnacle Exploration Ltd  
(Formerly known as South West Pinnacle Exploration Pvt Ltd)  
CIN NO.: L13203HR2006PLC049480  
**Regd & Corp Office:**  
Ground Floor, Plot No.15,  
Sector-44, Gurgaon 122003, Haryana, India.  
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W: [www.southwestpinnacle.com](http://www.southwestpinnacle.com)

**Date: May 30, 2025**

To, Listing Department National Stock Exchange of India Ltd. Exchange Plaza, 5th Floor Plot No. C/1, G Block, Bandra-Kurla Complex Mumbai 400051 <b>SYMBOL: SOUTHWEST</b>	To, Listing Department Bombay Stock Exchange Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai-400001 <b>Script Code: 543986</b>
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**Subject: Submission of Annual Secretarial Compliance Report for the Year ended March 31, 2025 under regulation 24(A) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015**

Respected Sir/ Madam,

Pursuant to regulation 24(A) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015 and amended, we are enclosing herewith "Annual Secretarial Compliance Report" of the company for the Year ended March 31, 2025 issued by M/s KKS & Associates, Practicing Company Secretary for your kind perusal.

This is for your information and records.

Thanking You

**For South West Pinnacle Exploration Limited**

**Vaishali**  
**Company Secretary & Compliance Officer**

Encl: a/a



**Annual Secretarial Compliance Report of South West Pinnacle Exploration Limited for the  
Financial Year ended 31<sup>st</sup> March, 2025**

**[Under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and  
Disclosure Requirements) Regulations, 2015]**

I have conducted the review of compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s **South West Pinnacle Exploration Limited (CIN-L13203HR2006PLC049480)** (hereinafter referred as 'the listed entity'), having its Registered & Corporate Office at Plot No. 15, Ground Floor, Sector - 44 Gurgaon-122003. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our 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, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2025, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I, KRISHNA KUMAR SINGH, have examined:

- all the documents and records made available to me and explanation provided by **South West Pinnacle Exploration Limited** ("the listed entity") (CIN - L13203HR2006PLC049480)
- the filings/submissions made by the listed entity to the Stock Exchanges,
- website of the listed entity,
- other documents/ filings, as may be relevant, which has been relied upon to make this Report.

for the financial year ended **31<sup>st</sup> March, 2025** ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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 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 Non- Convertible Securities) Regulations, 2021; **(Not applicable during the review period);**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) 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: **Please refer Annexure A**
- (b) The listed entity has taken the following actions to comply with the observations made in previous reports:

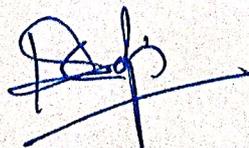
Sr. No.	Observations/Remarks of the Practicing Company Secretary in the previous reports (PCS)	Observations made in the secretarial compliance report for the yearended ..... (theyears	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity



		are to be mentioned)		entity		
N.A.						

(c) I hereby report that, during the Review Period the compliance status of the listed entity with the following requirements::

Sl. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS
1.	<p><b><u>Secretarial Standards:</u></b></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p>	Yes	None
2.	<p><b><u>Adoption and timely updation of the Policies:</u></b></p> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes  Yes	None  None
3.	<p><b><u>Maintenance and disclosures on Website:</u></b></p> <ul style="list-style-type: none"> <li>The Listed entity is maintaining a functional website.</li> <li>Timely dissemination of the documents/information under a separate section on the website.</li> <li>Web-links provided in annual corporate governance report under Regulation 27(2) are</li> </ul>	Yes  Yes  Yes	None




	accurate and specific which re-directs to the relevant document(s)/ section of the website.		
4.	<b><u>Disqualification of Directors:</u></b>  None of the Directors of the Company is disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None
5.	<b><u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u></b>  a) Identification of material subsidiary companies. b) Disclosure requirement of material as well as other subsidiaries.	No  Not Applicable	Listed entity does not have any material subsidiary, however, it has two(2) wholly owned subsidiary i.e. M/s Pilot Pipelines Private Limited and M/s South West Geo Services Private Limited and one (1) subsidiary M/s South West Oil Field Services Private Limited
6.	<b><u>Preservation of Documents:</u></b>  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.	<b><u>Performance Evaluation:</u></b>  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	None





	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.		
13.	<b>Additional Non-compliances, if any:</b>  No additional non-compliance observed for any of the SEBI regulation/circular/guidance note etc. except as reported above.	Yes	No additional non-compliances were observed for any SEBI regulation/ Circular/ Guidance note etc. during the year under review except as stated in Annexure A.

\* Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

**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.

Place: Delhi  
Date: 30.05.2025

PR No: 2105/2022

UDIN: F008493G000501755

For KKS & Associates  
(Company Secretary)



Krishna Kumar Singh  
Proprietor  
M. No. 8493  
COP No: 9760





## ANNEXURE A

Sr. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
1.	Reg17(1)-The Board of Directors shall have optimum of a combination of executive and nonexecutive directors Independent  Reg18(1)- Composition of Audit committee  Reg. 20(1) - of Stakeholders Relationship Committee	Regulation 17(1), 18(1) and 20(1) of the SEBI (LODR) Regulations 2015	Delay in filing vacancy of Independent Director	National Stock Exchange of India Limited (NSE) and BSE Limited (BSE)	NSE and BSE has levied monetary fine vide its Notices dated August 21, 2024. For the quarter ended June 2024.	Due date of appointment - April, 01 2024  Actual date of appointment - June 30, 2024  Reg17(1)- Non-compliance related to Board composition	The details of the fine amount are as under <u>Quarter ended June 2024</u>  <u>For Reg17(1)-</u> Fine of Rs. 4,50,000 plus GST by NSE and BSE each  <u>For Reg18(1)-</u> Fine of Rs.. 42,000 plus GST by NSE and BSE each	The Company has always made all regulatory compliances on time.  Further, composition of the Board the Company has always been in place (with six directors including a woman director) since it got listed on the National Stock Exchange of India (NSE) in February 2018 on SME platform and in April 2019 in the main	The management has filed the vacancy by 30, 2024 and filed an application for waiver of fines dated September 04, 2024 with BSE and NSE.	BSE fully waived off the fine and NSE had partially waived off Rs. 82000 and the company had paid Rs. 4,50,000 on October 16, 2025.




2.	Reg. 17 (1A) No listed entity shall appoint a person or continue the directorship of any person as a non-executive director	Regulation 17(1A), of the SEBI (LODR) Regulations, 2015	The company had appointed Mr. Rajendra Prasad Ritolia as non-executive director in the Board meeting	National Stock Exchange of India Limited. (NSE) and BSE	NSE and BSE has levied monetary fine vide its Notices dated March 17, 2025	on for the quarter ended on June 2024 Reg 18(1)- Non-compliance relating to composition of Audit Committee Reg 20(1)- Non-compliance with the composition of stakeholder relationship committee	For Reg 20(1)- Fine of Rs. 42,000 plus GST by NSE and BSE each	board of NSE and duly complied with the applicable provisions of the Companies Act 2013 and Regulations 2015, despite the exemptions specified under Regulations 15(2)(b) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015	The management had filed an application for waiver of	The decision on waiver application is still pending.
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	who has attained the age of seventy five years unless a special resolution is passed		dated August 12, 2024 who has attained the age of 75 years and passed the special resolution dated September 27, 2024 making his effective date of appointment as August 12, 2024.	Limited (BSE)	For the quarter ended on September 2024	without passing Special resolution		finesdated March 31, 2025	
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