



GUJARAT GAS
13th May, 2026

GGL/SEC/1566/2026

To,

BSE Limited, Phiroze Jijibhoy Tower, Dalal Street, Mumbai Company Code: BSE-539336	National Stock Exchange of India Ltd Exchange Plaza, 5 th Floor, Plot No. C/1, G Block, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051 Company Code: NSE-GUJGASLTD
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Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended on 31st March, 2026 - Reg. 24A of SEBI Listing Regulations.

Respected Sir/ Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report for the Financial Year ended on 31st March, 2026, issued by K K Patel & Associates, Practising Company Secretaries, Gandhinagar.

We request you to take the same on your records.

Thanking you,

For Gujarat Gas Limited

Sandeep Dave
Company Secretary

Encl: As above

GUJARAT GAS LIMITED

Corporate Office: Office No. 4 & 5, Ground Floor, IT Tower -2, Infocity, Gandhinagar – 382009 Gujarat
Registered Office: Gujarat Gas CNG Station, Sector-5/C, Gandhinagar - 382 006, Gujarat, India. Tel.: +91-79-23264777, 23264999
Website: www.gujaratgas.com, www.gspcgroup.com CIN: L40200GJ2012SGC069118



Secretarial Compliance Report of Gujarat Gas Limited (CIN: L40200GJ2012SGC069118) for the year ended on 31st March, 2026

We, K. K. Patel & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by the officers and staff of **GUJARAT GAS 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 certification,

for the year ended on **31st March, 2026** ("Review Period") in respect of 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 Act");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined (to the extent applicable), includes:

- (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;



- (f) The Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021;
- (g) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and 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 issue 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
NIL										

-) 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	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 PCS on the actions taken by the listed entity
NIL						



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

Sr. No	Particulars	Compliance Status (Yes/No/NA)	Observations/remarked by PCS
1.	<p><u>Secretarial Standards:</u></p> <p>The compliance of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI) as notified by the Central Government under Section 118 (10) of the Companies Act, 2013 and mandatorily applicable.</p>	Yes	NA
2.	<p><u>Adoption and timely up-dation of the Policies:</u></p> <ul style="list-style-type: none"> • 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 Yes	NA NA
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> • 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 redirect to the relevant document(s)/section of the website. 	Yes Yes Yes	NA NA NA
4.	<p><u>Disqualification of Director(s):</u></p> <p>None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies</p>	Yes	NA



	Act,2013as confirmed by the listed entity		
5.	<u>Details related to subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	NA NA	Refer Note 1
6.	<u>Preservation of Documents:</u> 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	NA
7.	<u>Performance Evaluation:</u> 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	NA
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of audit committee for all related party transactions; (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.	Yes Yes	NA NA
9.	<u>Disclosure of events or information:</u> 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	NA



10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	NA
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> 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 or The actions taken against the listed entity/ its promoters/directors/subsidiaries either by SEBI or by Stock Exchanges are specified in the last column	Yes NA	NA There is no such event during the year under review.
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	NA
13.	<u>Additional non-compliances, if any:</u> No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	NA	No such observations

Note:

*** Material Events/Information up to the date of this Report:**

The entities involved in the Composite Scheme of Amalgamation and Arrangement had filed Joint Company Application to Hon'ble Ministry of Corporate Affairs, New Delhi ("MCA") on 12th February, 2025. The Hon'ble MCA vide Order dated 10th September, 2025 directed Gujarat State Petroleum Corporation Limited (GSPC), Transferor Company 1, Gujarat State Petronet Limited (GSPL), Transferor Company 2, and Gujarat Gas Limited (GGL), Transferee Company to convene meeting of Equity Shareholders for considering and approving the Composite Scheme of Amalgamation and Arrangement. As per the directions of the Hon'ble MCA, the meeting of the Equity



Shareholders of GSPC, GSPL and GGL was duly convened on 17th October, 2025. The Shareholders of respective companies had approved the Scheme with requisite majority.

Further, the Hon'ble MCA, vide its Order dated 8th April, 2026 received by the Company on 17th April, 2026, sanctioned the Composite Scheme of Amalgamation and Arrangement.

The said Scheme became effective on 1st May, 2026 upon filing of the certified copy of the Final Order with the Registrar of Companies, Ahmedabad, in Form INC-28 by the Transferor Company, Transferee Company and Resulting Company. Consequently, GSPC, GSPL and GSPC Energy Limited (GSPC Energy) has been amalgamated with and into GGL w.e.f. Amalgamation Appointed Date 1st April, 2024. Further, the Gas Transmission Business Undertaking stands demerged from Gujarat Gas Limited into GSPL Transmission Limited (GTL) w.e.f. Demerger Appointed Date 1st April, 2025. Further, GSPC, GSPL and GSPC Energy stands dissolved without winding up w.e.f. 1st May, 2026.

Note-1:

1. Upon Scheme of Amalgamation and Arrangement coming into effect w.e.f. 1st May, 2026, the subsidiary companies of GSPC have become subsidiary companies of GGL. Further, the subsidiary companies of GSPL have become subsidiary companies of GTL.

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 report 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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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: 13.05.2026
Place: Gandhinagar



For, K. K. PATEL & ASSOCIATES

Company Secretaries

FRN: S2004GJ071900

PR Certificate No.:

1636/2021

Kiran Kumar Patel

FCS No: 6384, C P No.:6352

UDIN: F006384H000351927