

SECRETARIAL AUDIT REPORT

[Pursuant to Section 204(1) of the Companies Act, 2013 and Rule No. 9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014]

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2026

To,
The Members,
M/s JUNGLE CAMPS INDIA LIMITED
(Formerly Known as Pench Jungle Resorts Private Limited)
CIN:L55101DL2002PLC116282
3rd Floor, H.No.10 Satya Niketan, Opp. Venkateshawara College,
Delhi, India, 110021

I have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by Jungle Camps India Limited (hereinafter called "**the Company**"). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts / statutory compliances and expressing my opinion there on.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended 31st March, 2026 complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31st March, 2026 according to the provisions of:

- 1 The Companies Act, 2013 (the Act) and the rules made there under;
- 2 The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under;
- 3 The Depositories Act, 1996 and the Regulations and bye-laws framed there under;
- 4 The provisions of Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial borrowings were not applicable to the Company for the financial year under report;
- 5 The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):-
 - a. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - b. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - c. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and;

- d. The Securities and Exchange Board of India (Depositories and Participants) Regulations 2018.
 - e. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- 6 Provisions of the following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act,1992 ('SEBI') were not applicable to the Company under the financial year under report:-
- a. The Securities Exchange Board of India (Share Based Employee Benefits & Sweat Equity) Regulations, 2021;
 - b. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and the Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
 - c. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, regarding the Companies Act and dealing with client;
 - d. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; and
 - e. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018.
- 7 The Contract Labour (Regulations & Abolition) Act,1970
- 8 The Employees Provident Fund & Miscellaneous Provisions Act, 1959
- 9 The Employees State Insurance Act, 1948
- 10 The Employment Exchange (Compulsory Notification of Vacancies Act), 1959
- 11 The Industries Dispute Act, 1947
- 12 The Maternity Benefit Act, 1961
- 13 The Minimum Wages Act, 1948
- 14 Sexual Harassment of women at workplace (Prevention and Redressal) Act, 2013
- 15 Employee Compensation Act, 1923
- 16 The Air (Prevention and Control of Pollution) Act, 1981
- 17 The Environment (Protection) Act, 1986

I have also examined compliance with the applicable clauses of the following:

1. Secretarial Standards issued by The Institute of Company Secretaries of India.
2. The Listing Agreement entered into by the Company with BSE Limited.

We further report that the Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. Following changes took place in the composition of the Board of Directors during the period under review.

S.No	Name of Directors	DIN	Date of Appointment/ Cessation
1.	Mukesh Kumar Dukia	06856451	Appointed w.e.f. 08 th April 2025
2.	Rakesh Kumar Soni	01590179	Appointed w.e.f. 08 th April 2025
3.	Amit Kumar Kaushik	08710535	Appointed w.e.f. 08 th April 2025

SHIVAM AGARWAL & ASSOCIATES
E-31A, 1st Floor, Jawahar Park, Laxmi Nagar New Delhi-110092
Mail: csshivamagarwal@gmail.com M.No:9873796405

4.	Arjun Singh Rathore	10706733	Resigned w.e.f 09 th April 2025
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Adequate notice is given to all Directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting. Majority decision is carried through while the dissenting members' views are captured and recorded as part of the minutes.

I further report that there are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

I further report that during the audit period, there was no specific action was taken by the Company having a major bearing on the Company's affairs in pursuance of the above referred laws, rules, regulations, guidelines.

For Shivam Agarwal & Associates
Company Secretaries

CS Shivam Agarwal
Proprietor
C.P No. 17959
UDIN: A049447H001048291
Peer Review Certificate no. 2536/2022

Place: New Delhi
Date: 07-08-2026

Note: This report is to be read with our letter of even date that is annexed as Annexure - I and forms an integral part of this report.

ANNEXURE - I

To,
The Members,
M/s JUNGLE CAMPS INDIA LIMITED
(Formerly Known as Pench Jungle Resorts Private Limited)
CIN:L55101DL2002PLC116282
3rd Floor, H.No.10 Satya Niketan, Opp. Venkateshawara College,
Delhi, India, 110021

Our report of even date is to be read along with this letter:

1. Maintenance of secretarial records is the responsibility of management of the Company. My responsibility is to express an opinion on these secretarial records based on our audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, followed provide a reasonable basis for our opinion.
3. I have not verified the correctness and appropriateness of financial records and books of accounts of the Company.
4. Wherever required, I have obtained the Management Representation about the compliance of laws, rules and regulations and happening of events, etc.
5. The compliance of the provisions of corporate and other applicable laws, rules and regulations, standards is the responsibility of the management. Our examination was limited to the verification of procedures on test basis.
6. The Secretarial Audit Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

For Shivam Agarwal & Associates
Company Secretaries

CS Shivam Agarwal
Proprietor
C.P No. 17959
UDIN: A049447H001048291
Peer Review Certificate no. 2536/2022

Place: New Delhi
Date: 07-08-2026