

PHOTON CAPITAL ADVISORS LIMITED

(CIN: L65910TG1983PLC004368)

Regd. Office: Plot. No.90-A, Road No.9, Jubilee Hills, Hyderabad-500 033, Telangana

Tel/Fax No: 091-9951339995

Website: <http://www.pcalindia.com//>, Email Id - info@pcalindia.com

Date: 15.04.2025

To
The Manager
DCS-CRD
BSE Limited
Phiroze Jeejeebhoy Towers
25th Floor, Dalal Street
Mumbai - 400 001
Maharashtra

Dear Sir,

Sub: Non-Applicability of provisions of Corporate Governance Compliance and Annual Secretarial Compliance Report

Ref: Scrip Code: 509084 & Reg. 15(2) of SEBI (LODR) Regulations, 2015

With reference to the above cited subject and pursuant to Reg. 15(2) of SEBI (LODR) Regulations, 2015, we hereby submit as follows:

1. The paid-up capital of the Company as on 31.03.2025 is Rs.1,51,36,940/- which is **not exceeding Rs. 10 Crores**
and
2. Net worth of the Company as on 31.03.2025 for the FY 2024-25 is Rs. 7,48,36,210/- which is **not exceeding Rs. 25 Crores**

In view of the above and as per Reg. 15(2) of SEBI (LODR) Regulations, 2015, the compliance with the Corporate Governance provisions and Annual Secretarial Compliance Report are not applicable to our Company and accordingly, we are not required to submit Corporate Governance report on a quarterly basis for the financial year 2025-26 and Annual Secretarial Compliance Report for the financial year ending on 31.03.2025.

As per Section II-B of SEBI Master Circular SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024, the certificate issued by Practicing Company Secretary for the paid-up equity share capital and net worth of the Company for previous three financial years is enclosed.

Kindly take the same on record.

Thanking you,

For PHOTON CAPITAL ADVISORS LIMITED

N. Sobharani
SOBHARANI NANDURY
WHOLE-TIME DIRECTOR
DIN: 00567002



CERTIFICATE

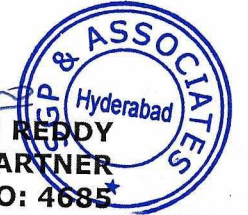
This is to certify that provisions of Regulation 27(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Regulation 15(2)(a) of Chapter IV of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 are not applicable to **PHOTON CAPITAL ADVISORS LIMITED** bearing CIN - L65910TG1983PLC004368 having its registered office at Plot. No. 90-A, Road No.9, Jubilee Hills, Hyderabad-500 033, Telangana (hereinafter referred to as 'the Company') for the Quarter ended 31.03.2025.

Further, the paid-up equity share capital of the Company does not exceed Rs.10 Crores and Net worth does not exceed Rs. 25 Crores during the 3 (three) previous financial years as shown in the below table: -

SI No.	Financial Year	Paid-Up Capital	Net worth
1.	2022-23	Rs.1,51,36,940/-	Rs. 10,34,37,528/-
2.	2023-24	Rs.1,51,36,940/-	Rs. 7,74,67,506/-
3.	2024-25	Rs.1,51,36,940/-	Rs. 7,48,36,210/-

Hence, the Company is not mandated to comply with the provisions of Regulation 27 (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Regulation 15(2)(a) of Chapter IV of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

**FOR SGP & ASSOCIATES
COMPANY SECRETARIES**



R. SIVARAM REDDY
PARTNER
C.P.NO: 4685

Place: Hyderabad
Date: 15.04.2025

SGP & Associates

Plot No. 188, Road No.21-A, Prashasan Nagar,
Road No. 72, Jubilee Hills, Hyderabad-500096, Telangana. India.

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