

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: 08-01-2025

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 for the FY 2023-24

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 31.03.2024 is Rs.1,51,36,940/- which is **not exceeding Rs. 10 Crores**
and
2. Net worth of the Company as on 31.03.2024 for the FY 2023-24 is Rs. 7,74,67,506/- 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 is not applicable to our Company and accordingly, the Corporate Governance report is not required to be submitted on a quarterly basis for the financial year 2024-25.

As per Section II-B of SEBI Master Circular SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023, 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 31.12.2024.

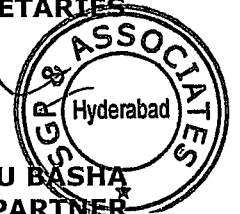
Further, the paid-up equity share capital of the Company does not exceed Rs.10 Crores and Net worth does not exceed Rs. 25 Crores during the 3 (three) previous financial years as shown in the below table: -

Sl No.	Financial Year	Paid-Up Capital	Net worth
1.	2021-22	Rs.1,51,36,940/-	Rs. 10,64,61,820/-
2.	2022-23	Rs.1,51,36,940/-	Rs. 10,34,37,528/-
3.	2023-24	Rs.1,51,36,940/-	Rs. 7,74,67,506/-

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**


DARGA MABU BASHA
PARTNER
C.P.NO: 19091



Place: Hyderabad
Date: 09.01.2025

SGP & Associates

Plot No. 188, Road No.21-A, Prashasan Nagar,
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