

INTEGRATED GOVERNANCE REPORT

COSMO FIRST LTD.	
Scrip Code :508814	Quarter Ending: September 30, 2025

<u>General Information about the Company</u>	
Scrip code	508814
NSE Symbol	COSMOFIRST
MSEI Symbol	NOTLISTED
ISIN	INE757A01017
Name of the entity	COSMO FIRST LIMITED
Date of start of financial year	01-04-2025
Date of end of financial year	30-06-2025
Reporting Quarter Type	Half -Yearly
Date of Quarter Ending	30-09-2025
Type of company	Equity
Whether Annexure I (Part A) of the SEBI Circular dated December 31, 2024 related to Compliance Report on Corporate Governance is applicable to the entity?	Yes
Whether Annexure I (Part B) of the SEBI Circular dated December 31, 2024 related to Investor Grievance Redressal Report is Applicable to the entity?	Yes

Whether Annexure I (Part C) of the SEBI Circular dated December 31, 2024 related to Disclosure of Acquisition of Shares or Voting Rights in Unlisted Companies is Applicable to the entity?	No (There has been no acquisition requiring disclosure on a quarterly basis, in terms of Regulation 30 of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular dated 31st December2024)
Whether Annexure I (Part D) of the SEBI Circular dated December 31, 2024 related to Disclosure of Imposition of Fine or Penalty is Applicable to the entity?	Yes
Whether Annexure I (Part E) of the SEBI Circular dated December 31, 2024 related to Disclosure of Updates to Ongoing Tax Litigations or Disputes is Applicable to the entity?	Yes
Whether Annexure I (Part F) of the SEBI Circular dated December 31, 2024 related to Disclosure of Loans / Guarantees / Comfort Letters / Securities Etc. is Applicable to the entity?	No (There is no disclosure required in terms of Regulation 30 of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular dated 31st December2024)
Risk management committee	Applicable
Market Capitalisation as per immediate previous Financial Year	Top 2000 listed entities
Is SCORE ID Available ?	Yes
SCORE Registration ID	c00201
Reason For No SCORE ID	
Type of Submission	Original

Composition of Board of Directors

Title	Name of the Director	Category	Initial Date of Appointment	Date of Appointment in Current Term (Date of Reappointment)	Date of cessation	Tenure of Director (in months)	No of Directorship in listed entities including this listed entity	Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity	No of post of Chairperson in Audit/ Stakeholder Committee held in listed entities including this listed entity
Mr	ASHOK JAIPURIA	Executive Director	10-10-1976	02-04-2024	-	-	2	0	0
Mr	ANIL KUMAR JAIN	Executive Director	24-05-2011	01-10-2024	-	-	1	1	1
Ms.	YAMINI KUMAR	Executive Director	12-02-2025	12-02-2025	-		1	1	0
Ms	ALPANA PARIDA	Non-Executive - Independent Director	14-02-2014	15-05-2024	-	77.00	2	1	1
Mr	HOSHANG NOSHIRWAN SINOR	Non-Executive – Non-Independent Director	22-05-2015	22-05-2025	-		1	2	0
Mr	PRATIP CHAUDHURI	Non-Executive - Independent Director	10-11-2014	11-02-2025	-	8.00	3	4	0
Mr	RAKESH NANGIA	Non-Executive - Independent Director	10-11-2020	10-11-2020	-	59.00	1	0	1
Mr	ANIL WADHWA	Non-Executive - Independent Director	23-05-2018	23-05-2023	-	89.00	2	3	0
Mr	ARJUN SINGH	Non-Executive - Independent Director	27-10-2021	27-10-2021	-	47.00	1	1	0
Mr	YASH PAL SYNGAL	Non-Executive - Independent Director	08-11-2023	08-11-2023	-	23.00	1	0	1

Composition of Committee

Audit Committee			
Name of Committee Members	Category	Date of Appointment	Date of Cessation
RAKESH NANGIA	Non-Executive - Independent Director, Chairperson	10-11-2020	-
ANIL WADHWA	Non-Executive - Independent Director, Member	15-05-2019	-
PRATIP CHAUDHURI	Non-Executive - Independent Director, Member	10-11-2014	-
ARJUN SINGH	Non-Executive - Independent Director, Member	15-05-2024	-
YAMINI KUMAR	Executive Director, Member	12-02-2025	-

Nomination & Remuneration Committee			
Name of Committee Members	Category	Date of Appointment	Date of Cessation
ARJUN SINGH	Non-Executive - Independent Director, Chairperson	11-02-2025	-
ASHOK JAIPURIA	Executive Director, Member	06-05-2003	-
ALPANA PARIDA	Non-Executive - Independent Director, Member	15-05-2024	-
YASH PAL SYNGAL	Non-Executive - Independent Director, Member	11-02-2025	-

Stakeholders Relationship Committee			
Name of Committee Members	Category	Date of Appointment	Date of Cessation
YASH PAL SYNGAL	Non-Executive - Independent Director, Chairperson	11-02-2025	-
ANIL KUMAR JAIN	Executive Director, Member	15-05-2019	-
HOSHANG NOSHIRWAN SINOR	Non-Executive – Non-Independent Director, Member	11-02-2025	-

Risk Management Committee			
Name of Committee Members	Category	Date of Appointment	Date of Cessation
ASHOK JAIPURIA	Executive Director, Chairperson	20-05-2021	-
ANIL KUMAR JAIN	Executive Director, Member	20-05-2021	-
ARJUN SINGH	Non-Executive - Independent Director, Member	27-10-2021	-
YASH PAL SYNGAL	Non-Executive - Independent Director, Member	15-05-2024	-
PANKAJ PODDAR	Chief Executive Officer, Member	20-05-2021	-
NEERAJ JAIN	Chief Financial Officer, Member	20-05-2021	-

Corporate Social Responsibility Committee			
Name of Committee Members	Category	Date of Appointment	Date of Cessation
ANIL WADHWA	Non-Executive - Independent Director, Chairperson	10-11-2020	-
ASHOK JAIPURIA	Executive Director, Member	14-02-2014	-
ALPANA PARIDA	Non-Executive - Independent Director, Member	14-02-2014	-
ANIL KUMAR JAIN	Executive Director, Member	15-05-2019	-
YASH PAL SYNGAL	Non-Executive - Independent Director, Member	15-05-2024	-
YAMINI KUMAR	Executive Director, Member	12-02-2025	-

Meeting of Board of Directors

Date(s) of meeting (if any) in the Previous quarter	Date(s) of meeting (if any) in the relevant quarter	Maximum gap between any two consecutive (in number of days)
20-05-2025	-	-
-	13-08-2025	84

Meeting of Committees

Name of Committee	Date(s) of meeting (if any) in the Previous quarter	Date(s) of meeting (if any) in the relevant quarter	Whether requirement of Quorum met (details)	Maximum gap between any two consecutive (in number of days)
Audit Committee	20-05-2025	-	Yes,	-
Audit Committee	-	13-08-2025	Yes,	84
Nomination and remuneration committee	20-05-2025		Yes,	
Stakeholders Relationship Committee	20-05-2025		Yes.	
Stakeholders Relationship Committee	-	13-08-2025	Yes,	84

Affirmations

Subject	Compliance status (Yes/No)
The composition of Board of Directors is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015	Yes
The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015 a. Audit Committee	Yes
The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. b. Nomination & remuneration committee	Yes
The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. c. Stakeholders relationship committee	Yes

The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. d. Risk management committee	Yes
The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	Yes
The meetings of the board of directors and the above committees have been conducted in the manner as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	Yes
This report and/or the report submitted in the previous quarter has been placed before Board of Directors.	Yes

Affirmations

Broad Heading	Regulation Number	Compliance status (Yes/No/NA)	If status is “No” details of non-compliance
Copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report, business responsibility report displayed on website	46(2)	Yes	-
Presence of Chairperson of Audit Committee at the Annual General Meeting	18(1)(d)	Yes	-
Presence of Chairperson of the nomination and remuneration committee at the annual general meeting	19(3)	Yes	-
Presence of Chairperson of the Stakeholder Relationship committee at the annual general meeting	20(3)	Yes	-
Disclosure of the Secretarial Audit Report of the listed entity and the material subsidiaries in the Annual Report	24A(1)	Yes	-

Compliance with the conditions laid down for Secretarial Auditor or the person signing the Secretarial Compliance Report	24A(1A), 24A(1B), 24A(1C)	Yes	
Submission of Annual Secretarial Compliance Report	24A(2)	Yes	-
Whether “Corporate Governance Report” disclosed in Annual Report	34(3) read with para C of Schedule V	Yes	-

Affirmations

<u>Details of Cyber Security Incidence</u>			
Whether as per Regulation 27(2)(ba) of SEBI (LODR) Regulations, 2015 there has been cyber security incidents or breaches or loss of data or documents during the quarter		No	
Date of the event	-	Brief details of the event	-

Signatory Details

Name of Signatory	JYOTI DIXIT
Designation of person	Company Secretary and Compliance Officer

Investor Grievance Details	
No. of investor complaints pending at the beginning of Quarter	1
No. of investor complaints received during the Quarter	0
No. of investor complaints disposed off during the Quarter	1
No. of investor complaints those remaining unresolved at the end of the Quarter	0

Disclosure of Imposition of Fine or Penalty

The details of imposition of fine or penalty during the quarter in terms of sub-para 20 of para A of Part A of Schedule III are given below:

Name of the authority	Nature and details of the action(s) taken or order(s) passed	Date of receipt of direction or order, including any ad interim or interim orders, or any other communication from the authority	Details of the violation(s)/ contravention(s) committed or alleged to be committed	Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible
Indian Customs Department	Charges for delayed presentation of Bill of Entry for imports	10-07-2025	Delayed presentation of Bill of entry for imports	35000
Indian Customs Department	Charges for delayed presentation of Bill of Entry for imports	11-07-2025	Delayed presentation of Bill of entry for imports	5000
Indian Customs Department	Charges for delayed presentation of Bill of Entry for imports	12-07-2025	Delayed presentation of Bill of entry for imports	5000
Indian Customs Department	Charges for delayed presentation of Bill of Entry for imports	08-08-2025	Delayed presentation of Bill of entry for imports	5000
Indian Customs Department	Charges for delayed presentation of Bill of Entry for imports	19-08-2025	Delayed presentation of Bill of entry for imports	5000
Indian Customs Department	Charges for delayed presentation of Bill of Entry for imports	11-09-2025	Delayed presentation of Bill of entry for imports	5000

Indian Customs Department	Charges for delayed presentation of Bill of Entry for imports	12-09-2025	Delayed presentation of Bill of entry for imports	5000
Indian Customs Department	Charges for delayed presentation of Bill of Entry for imports	20-09-2025	Delayed presentation of Bill of entry for imports	5000

Disclosure of Updates to Ongoing Tax Litigations or Disputes

The updates on tax litigations or disputes in terms of sub-para 8 of para B of Part A of Schedule III read with corresponding provisions of Annexure 18 of the Master Circular are given below:

Name of the opposing party	Date of initiation of the litigation / dispute	Status of the litigation / dispute as per last disclosure	Current status of the litigation / dispute
Commissioner of Customs, Mumbai	21-12-2020	Not Applicable	The Commissioner of Customs, Adjudication, Mumbai had: a) confirmed the demand of Rs. 14.39 Cr due to non fulfilment of pre import condition with respect to imports under Advance Authorisations availing exemption from payment of IGST during FY 2017-18 and 2018-19; b) dropped the proceedings for recovery of interest, confiscation of impugned goods and imposition of penalty. Modalities of payment are under discussion with the custom authorities. The Company would be eligible to avail input tax credit for the amount paid. Hence, there will be no financial impact.
Additional Commissioner, Central GST & Central Excise, Vadodara-I	10-03-2025	The Additional Commissioner, Central GST & Central Excise, Vadodara-I had issued an order demanding an amount of Rs. 2.71 Cr. along with interest and a penalty of Rs. 0.27 Cr. on account of erroneous refund of IGST. The demand pertains to the refunds received by the company on exports made on payment of IGST. The Company is taking appropriate steps to file an appeal against the order received from the GST authorities. The Company does not foresee any material impact on the financial, operational, or other activities.	The Company has filed an appeal on the matter which is pending.