

# GACM TECHNOLOGIES LIMITED

(Formerly Known as Stampede Capital Limited)

**Date:** May 29, 2025

To,  
The Secretary,  
Listing Department  
BSE Limited  
P.J Towers, Dalal Street, Fort,  
Mumbai - 400 001

**Scrip Code: 531723 / 570005**

To,  
The Manager,  
Listing Department,  
National Stock Exchange of India Limited  
Exchange Plaza. 5th Floor, Plot No. C/1, G  
Block Bandra - Kurla Complex, Bandra (E),  
Mumbai-400051, Maharashtra.

**Symbol: GATECH / GATECHDVR**

**SUBJECT: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED MARCH 31, 2025.**

**REFERENCE: REGULATION 24A OF THE SECURITIES AND EXCHANGE BOARD OF INDIA ("SEBI") (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 ("THE LISTING REGULATIONS").**

Dear Sir / Madam,

In furtherance to the captioned subject and mentioned reference, Please find enclosed herewith the Annual Secretarial Compliance Report for the financial year March 31, 2025 issued by M/s. A.K. RASTOGI & ASSOCIATES, Practising Company Secretaries (CP No.: 22973).

This report is also being made available on the Company's website:  
<https://www.gacmtech.com>

We request you to take the above on your record.

Thank you,  
Yours faithfully,

**For and on Behalf of GACM TECHNOLOGIES LIMITED**  
**(Formerly Known as Stampede Capital Limited)**

**Sujata Suresh Jain**  
**Company Secretary and Compliance Officer**  
**Membership No.: A59706**  
**Place: Hyderabad**  
**Encl: A.A**

**REGISTERED OFFICE:** KURA Towers, 10th Floor, D. No. 1-11-254 & 1-11-255 S.P. Road, Begumpet, Hyderabad-500016, Telangana, India.

**CIN:** L67120TG1995PLC020170

**WEBSITE:** <https://www.gacmtech.com/> **EMAIL ID:** [cs@gacmtech.com](mailto:cs@gacmtech.com)

**CONTACT:** 040-69086900/84



**A.K. RASTOGI & ASSOCIATES**  
**Company Secretaries**

**R-13/69, RAJ NAGAR**  
**GHAZIABAD-201002(U.P)**  
**Mob:9650990414**  
[anilrastogi3609@gmail.com](mailto:anilrastogi3609@gmail.com),  
[anil\\_rastogi29@rediffmail.com](mailto:anil_rastogi29@rediffmail.com)

**To,**  
**GACM Technologies Limited**  
**KURA Towers, 10<sup>th</sup> Floor, D. No. 1-11-254 & 1-11-255**  
**S.P. Road, Begumpet,**  
**Hyderabad, Telangana-500016**

**Sub: Annual Secretarial Compliance Report of GACM Technologies Limited for the Financial Year ended on 31st March, 2025**

**Members,**

We have conducted the review of the compliances of the applicable statutory provisions and the adherence of good corporate governance practices by **GACM Technologies Limited** (hereinafter referred to as 'the Company') bearing CIN: **L67120TG1995PLC020170**, having its registered office at KURA Towers, 10<sup>th</sup> Floor, D. No. 1-11-254 & 1-11-255, S.P. Road, Begumpet, Hyderabad, Telangana-500016, whose equity shares are listed on National Stock Exchange of India Limited (NSE) and BSE Limited for the purpose of issue of Annual Secretarial Compliance Report in terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.

Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/ statutory compliances and expressing our opinion thereon.

Based on our verification of the Company's books, papers, minutes books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents, and authorised representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the Company has, during the review period, 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:

1. We have examined:

- (a) all the documents and records made available to us and explanation provided by the Company;
- (b) the filings/ submissions made by the Company to the Stock Exchanges,
- (c) website of the Company;
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this Report, for the Financial Year ended 31<sup>st</sup> March, 2025 ("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 SEBI.

2. The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, during the Review Period include: -

(a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable during the review period)**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable during the review period)**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable during the review period)**

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

(g) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

(h) other regulations as applicable and circulars/ guidelines issued thereunder, and based on the above examination, We hereby report that, during the Review Period:

(a) The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued 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 Advisory/ Clarification/ Fine/Show Cause Notice / Warning etc.	Details of Violation	Fine Amount (in Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
<b>NIL</b>										

(b) The Company 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 (PCS)	Observations made in the secretarial compliance report for the year ended 31/03/2024	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the Company	Remedial actions, if any, taken by the Company	Comments of the PCS on the actions taken by the Company
1.	NIL	NIL	Vide Gazette Notification No. SEBI/LADNR O/GN/2020/23 dated July 17, 2020, Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations) have been further amended.	Violation of Company's Code of Conduct by one of the designated person of the Company i.e. GAYIADI Holdings Private Limited (Formerly known as GAYI ADI Management and Trends Private Limited), the promoter of the Company ("the promoter Company"). The promoter Company violated the provisions of SEBI (Prohibition of Insider Trading) Regulation s, 2015, by sold 1,36,50,000 Equity Shares with normal voting rights @ 01.00/- per	The promoter /designated person deposited the said penalty of Rs. 50,000/- with the Investor Protection and Education Fund ("IPEF") administered by the Board under the Securities and Exchange Board of India Act, 1992.	Since the company has already deposited the penalty imposed on it as such our comments are NIL.

				share and 72,11,643 DVR Shares @ 09.54/- per share of the Company on April 01, 2023.		
2.	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer.	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer.	Regulation 6(1) Non-compliance with requirement to appoint a qualified company secretary as the compliance officer	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer. Fine by BSE, Rs. 1,000 per day (computed till quarter ended December 2023)	The management sent detailed reply letter and reason to the exchange why they were not able to appoint Company Secretary as the compliance officer.	The Company has appointed Company Secretary and Compliance Officer w.e.f. 14.12.2023 as such compliance has been made.
3.	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer.	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer.	Regulation 6(1) Noncompliance with requirement to appoint a qualified company secretary as the compliance officer	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer. Fine by NSE, Rs. 1,000 per day (computed till quarter ended December 2023).	The management sent detailed reply letter and reason to the exchange why they were not able to appoint Company secretary as the compliance officer	The Company has appointed Company Secretary and Compliance Officer w.e.f. 14.12.2023 as such compliance has made.
4.	Regulation 23(9) of SEBI (LODR) Regulations, 2015 which, inter-alia, requires the listed entities to submit disclosures of related party transactions every six months on the date of publication of its standalone and consolidated financial results to the stock exchanges. Company has replied with necessary information to the stock exchange.	Regulation 23(9) of SEBI (LODR) Regulations, 2015 which, inter-alia, requires the listed entities to submit disclosures of related party transactions every six months on the date of publication of its standalone	Regulation 23(9) of SEBI (LODR) Regulations, 2015 which, inter-alia, requires the listed entities to submit disclosures of related party transactions every six months on the date of publication of its standalone	The Exchange has observed the following discrepancies: Details pertaining to Loans such as rate of interest, tenure, purpose, end use have not been mentioned in the PDF Value as approved by Audit committee has not been mentioned for	The Company has made detailed reply to the stock exchange pertaining to interest, tenure, purpose, end use and details pertaining to interest, tenure, purpose, end use.	<b>NIL</b>

		and consolidated financial results to the stock exchanges.	and consolidated financial results to the stock exchanges.	loan and advances taken transactions.		
5.	GACM Technologies Limited (Formerly known as "Stampede Capital Limited") ("the Company") has submitted the Initial Disclosure for Financial Year 2023 – 2024 with exchange within 30 days from commencement of the Financial Year i.e., on April 27, 2023. The acknowledgment of submission of Initial Disclosure with NSE along with Initial Disclosure as+30 submitted in the specified format.	NIL	The query raised by the Exchange is as follows: Discrepancy: 1. Initial disclosure not submitted for Financial Year 2023 – 2024.	Initial disclosure not submitted for Financial Year 2023-24.	GACM Technologies Limited (Formerly known as "Stampede Capital Limited") ("the Company") has submitted the Initial Disclosure for Financial Year 2023 – 2024 with exchange within 30 days from commencement of the Financial Year i.e., on April 27, 2023. The acknowledgment of submission of Initial Disclosure with NSE along with Initial Disclosure as submitted in the specified format.	NIL

(c) We hereby report that, during the review period the compliance status of the Company with the following requirements:

Sr. No	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS
1	<p><b>Secretarial Standards:</b></p> <p>The compliances of the Company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).</p>	Yes	<p><b>Secretarial Standard have generally been Complied with by the Company.</b></p>
2	<p><b>Adoption and timely updation of the Policies:</b></p> <ul style="list-style-type: none"> <li>•All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity.</li> <li>•All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>	Yes  Yes	<p><b>None</b></p> <p><b>Company has adopted the policies under SEBI regulations but the same are under review.</b></p>
3	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>• The Company is maintaining a functional website.</li> <li>• Timely dissemination of the documents/ information under a separate section on the website.</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website</li> </ul>	Yes  Yes  Yes	<p><b>None</b></p> <p><b>None</b></p> <p><b>In some cases, the information and documents updated delayed.</b></p>
4	<p><b>Disqualification of Director(s):</b></p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the Company.</p>	Yes	<p><b>None</b></p>

<b>5</b>	<p><b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b></p> <p>(a) Identification of material subsidiary companies;</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>	<p><b>Yes</b></p> <p><b>Yes</b></p>	<p><b>None</b></p> <p><b>None</b></p>
<b>6</b>	<p><b>Preservation of Documents:</b></p> <p>The Company 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.</p>	<p><b>Yes</b></p>	<p><b>None</b></p>
<b>7</b>	<p><b>Performance Evaluation:</b></p> <p>The Company 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.</p>	<p><b>Yes</b></p>	<p>None</p>
<b>8</b>	<p><b>Related Party Transactions:</b></p> <p>(a) The Company has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) In case no prior approval obtained, the Company shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the audit committee.</p>	<p><b>Yes</b></p> <p><b>NA</b></p>	<p><b>None</b></p> <p><b>None</b></p>
<b>9</b>	<p><b>Disclosure of events or information:</b></p> <p>The Company 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.</p>	<p><b>Yes</b></p>	<p><b>None</b></p>
<b>10</b>	<p><b>Prohibition of Insider Trading:</b></p> <p>The Company is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition</p>		

	of Insider Trading) Regulations, 2015.	<b>Yes</b>	<b>None</b>
<b>11</b>	<p><b>Actions taken by SEBI or Stock Exchange(s), if any:</b></p> <p>No action(s) has been taken against the Company/ 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)</p> <p>The action(s) taken against the company/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	<b>NA</b>	<b>None</b>
<b>12</b>	<p><b><u>Resignation of statutory auditors from the listed entity or its material subsidiaries</u></b></p> <p>In case of Resignation of statutory auditors from the Company or of its material subsidiaries during the financial year. The Company and / or its material subsidiaries(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 LODR Regulations by listed entities.</p>	<b>NA</b>	<b>Not applicable during the year under review</b>
<b>13</b>	<p><b>Additional Non-compliances, if any:</b></p> <p>No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.</p>	<b>Yes</b>	<ul style="list-style-type: none"> <li>• As per regulation 25(7) of SEBI (LODR) Regulation, 2015, the listed entity shall familiarize the independent directors through various programme about the listed entity. During the period under review no such programme has been conducted by the company.</li> </ul>

**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 Company.
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 Accounts of the Company.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and 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.

**Place: Ghaziabad**

**Date: 29.05.2025**

**For A.K. Rastogi & Associates  
Company Secretaries  
ICSI Unique code No P2025UP104900  
Peer Review Certificate No. 3322/2023**

**(A.K. Rastogi)  
PARTNER  
Mem. No.: F1748; COP No.: 22973  
UDIN: F001748G000491006**