

SHIVAM AGARWAL & ASSOCIATES

E31A First Floor Jawahar Park Laxmi Nagar New Delhi-110092

Mail: csshivamagarwal@gmail.com M.No:9873796405

Date: 03.05.2025

To,
**Head of the Listing Department,
Calcutta Stock Exchange Limited,
7, Lyons Range, 4th Floor, Kolkata –700 001**

We confirm that as on date WEBPULSE CONSULTING INDIA COM LTD “the Company” satisfies the following conditions as stipulated in the Regulations 17 to 27 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as given hereunder:

Sr. No.	Requirements	Compliance			
i)	The Board of directors of the company has a composition of executive and non-executive directors with not less than fifty percent of the board of directors comprising of non-executive directors The names of the directors and their status	Complied Total Board Members: 3			
		Name of the Director	Designation	Independent/ Non Independent	
		Naresh Kathpalia	Managing Director	Non Independent	
		Sanjeev Kumar Manchanda	Director	Independent	
		Surender Singh	Director	Non Independent	
ii)	Where the Chairman of the Board non-executive director, at least one-third of the Board should comprise of independent directors and in case he is an executive director, at least half of the Board should comprise of independent directors. Where the non-executive Chairman	Status of the Chairman- Executive Independent members: 1 Non-independent members: 2			

SHIVAM AGARWAL & ASSOCIATES

E31A First Floor Jawahar Park Laxmi Nagar New Delhi-110092

Mail: csshivamagarwal@gmail.com M.No:9873796405

	is a promoter of the company or is related to any promoter or person occupying management positions at the Board level or at one level below the Board, at least one-half of the Board of the company shall consist of independent directors.	
iii)	The independent director as mentioned at sub-clause (ii) above, is the non- executive director who complies with the following:	
a	apart from receiving director's remuneration, does not have any material pecuniary relationships or transactions with the company, its promoters, its directors, its senior management or its holding company, its subsidiaries and associates which may affect independence of the director	We confirm that none of the independent director of the company have any material pecuniary relationships or transactions with the company, its promoters, its directors, its senior management or its holding company, its subsidiaries and associates
b	is not related to promoters or persons occupying management positions at the board level or at one level below the board	We confirm that none of the independent director of the company are related to promoters or persons occupying management positions at the board level or at one level below the board
c	has not been an executive of the company in the immediately preceding three financial years	We confirm that none of the independent director has been an executive of the company in the immediately preceding three financial years
d	is not a partner or an executive or was not partner or an executive during the preceding three years, of any of the following: i) the statutory audit firm or the internal audit firm that is associated with the company, and ii) the legal firm(s) and consulting firm(s) that have a material association with the company.	We confirm that none of the independent director is a partner or an executive or was not partner or an executive during the preceding three years, of any of the following: 1) the statutory audit firm or the internal audit firm that is associated with the company, and 2. the legal firm(s)and consulting firm(s)that have a material association with the company.
e	is not a material supplier, service provider or customer or a lessor or lessee of the company, which may affect independence of the director.	We confirm that none of the independent directors is a material supplier, service provider or customer or a lessor or lessee of the company

SHIVAM AGARWAL & ASSOCIATES

E31A First Floor Jawahar Park Laxmi Nagar New Delhi-110092

Mail: csshivamagarwal@gmail.com M.No:9873796405

f	is not a substantial shareholder of the company i.e. owning two percent or more of the block of voting shares.	We confirm that none of the independent directors own two percent or more of the block of voting shares of the company
g	is not less than 21 years of age.	We confirm that none of the independent directors are less than 21 years of age

We also confirm that none of the independent directors named below would qualify within the definition of promoter/ promoter group as given in SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018: **Not Applicable**

Further, the company is in compliance with requirement of the Audit Committee, the Shareholders / Investors Grievance Committee. The composition of the said committees is as under:

Composition of Audit Committee

Sr. No.	Name of the Members	Status whether Independent/ Non-Independent (Including Chairman of the Committee)
1.	NARESH KATHPALIA	Non-Independent Director
2.	SANJEEV KUMAR MANCHANDA	Independent Director & Member (Chairman)
3.	SURENDER SINGH	Non-Independent Director

Composition of Nomination Committee

Sr. No.	Name of the Members	Status whether Independent/ Non-Independent (Including Chairman of the Committee)
1.	NARESH KATHPALIA	Non-Independent Director
2.	SANJEEV KUMAR MANCHANDA	Independent Director & Member (Chairman)
3.	SURENDER SINGH	Non-Independent Director

Composition of the Shareholders / Investors Grievance Committee

Sr. No.	Name of the Members	Status whether Independent/ Non-Independent (Including Chairman of the Committee)
1.	NARESH KATHPALIA	Non-Independent Director
2.	SANJEEV KUMAR MANCHANDA	Independent Director & Member (Chairman)
3.	SURENDER SINGH	Non-Independent Director

SHIVAM AGARWAL & ASSOCIATES

E31A First Floor Jawahar Park Laxmi Nagar New Delhi-110092

Mail: cssshivamagarwal@gmail.com M.No:9873796405

**For Shivam Agarwal & Associates
Company Secretary**

**ACS Shivam Agarwal
ACS 49447
COP No. 17959
Peer Review No. 2536/2022**

**Place: Delhi
Date: 03.05.2025
UDIN: A049447G000261692**