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Regd. Office:
2, G.F., Abhishek Building,
Sector-11, Gandhinagar-382011.

CIN - L45209GJ1999PLC036003



Date: 30th May, 2022

To,
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai – 400 051
SYMBOL: AKASH

Dear Sir,

Sub: Submission of Annual Secretarial Compliance Report for the financial year ended on 31st March, 2022.

Pursuant to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 please find enclosed herewith Annual Secretarial Compliance Report issued by H Choudhary & Associates, Practicing Company Secretary (C. P. No. 9369) for the financial year ended on 31st March, 2022.

We request you to kindly take the same on your record.

Thanking you,

Yours faithfully,

FOR AKASH INFRA-PROJECTS LIMITED

YOGINKUMAR HARIBHAI PATEL
MANAGING DIRECTOR

Encl.: As above

H CHOUDHARY & ASSOCIATES

COMPANY SECRETARIES

D-17, Sangli Cooperative Housing Society, Western Express Highway,
Jogeshwari East, Mumbai - 400 060.
Email : sethi.legal@gmail.com ; Mob. 8655682736.

SECRETARIAL COMPLIANCE REPORT OF AKASH INFRA-PROJECTS LIMITED FOR THE YEAR ENDED ON MARCH 31, 2022.

To,
AKASH INFRA-PROJECTS LIMITED
CIN: L45209GJ1999PLC036003
2, Ground Floor, Abhishek Complex,
Opp. Hotel Haveli, Sector-11,
Gandhinagar 382011, Gujarat

We, H Choudhary & Associates, Practicing Company Secretaries, have examined:

- a) all the documents and records made available to us electronically or otherwise and explanation provided by Akash Infra-Projects Limited ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on 31st March, 2022 ("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 Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, to the extent applicable;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Company during the Review Period)**;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, to the extent applicable;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the Company during the Review Period)**;
- e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (up to 12th August, 2021) and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (with effect from 13th August, 2021) **(Not Applicable to the Company during the Review Period)**;

- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (up to 16th August 2021), **(Not Applicable to the Company during the Review Period)**;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (up to 16th August 2021), **(Not Applicable to the Company during the Review Period)**;
- h) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (with effect from 16th August 2021), **(Not Applicable to the Company during the Review Period)**
- i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; to the extent applicable;
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, to the extent applicable;
- k) The Depositories Act, 1996 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, to the extent applicable,

And circulars / guidelines issued thereunder,

and based on the above examination, we, hereby report that, during the review period:

- a) The listed entity has complied with all the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.
- c) No action has been taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchange under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.
- d) The listed entity has taken following actions to comply with the observation made by Practicing Company Secretary in previous report:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial compliance report for the year ended on	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The meeting of the Board of Directors of the Company on 31st August, 2020 was held without presence of any Independent Director being one of the Top 1000 listed entities as on 31.03.2020.	31.03.2021	The business agenda item taken up during the meeting held on 31.08.2020 has been ratified by the Board of Directors in their meeting held on 13.02.2021. Further, the Company has made the payment Rs. 11,800/-	Company has taken appropriate action in the matter. It is clarified that quorum of all the Board meetings other than one board meeting held on 31st August, 2020 is in compliance with SEBI

Regulation 17 (2A) of SEBI (LODR) Regulations requires presence of at least one Independent Director in every board meeting for Top 1000 listed entities.	towards the fine levied by NSE Limited.	(LODR) Regulations.
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Further, the Company has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment of statutory auditor of the Company.

**FOR H CHOUDHARY & ASSOCIATES
COMPANY SECRETARIES**

Harnatharam
N Choudhary

Digitally signed by
Harnatharam N
Choudhary
Date: 2022.05.30 16:28:54
+05'30'

**HARNATH CHOUDHARY
PRACTICING COMPANY SECRETARY
PROPRIETOR**

M No.: F8274, C.O. P. No.: 9369

**Place: Mumbai
Date : 30.05.2022
UDIN : F008274D000427321
PEER REVIEW NO. : 2147/2022**