Ph.: +91-79-23227006 E-mail: info@akashinfra.com

Regd. Office:

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

CIN - L45209GJ1999PLC036003

Date: May 29, 2025

To,

**National Stock Exchange of India Limited** 

Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai – 400 051

**SYMBOL:** AKASH

Dear Sir,

<u>Sub: Submission of Annual Secretarial Compliance Report for the financial year ended</u> on March 31, 2025.

INFRA-PROJECTS

**BUILDERS OF RELIABLE ROADS** 

Pursuant to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time and please find enclosed herewith Annual Secretarial Compliance Report issued by V. N. Vasani & Associates, Practicing Company Secretary (C. P. No. 12743) for the financial year ended on March 31, 2025.

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 DIN: 00463335

Encl.: As above



### Secretarial Compliance Report of AKASH INFRA-PROJECTS LIMITED For the financial year ended 2025

- I, VIVEK NITINKUMAR VASANI, Practicing Company Secretary, have examined:
- (a) All the documents and records made available to us and explanation provided by AKASH INFRA-PROJECTS LIMITED ('the listed entity'),
- (b) The filings/ submissions made by the listed entity to the Stock Exchange,
- (c) Website of the listed entity,
- (d) any other document/filing, as may be relevant, which has been relied upon to make this Report,

For the financial year ended on March 31, 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 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:
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not Applicable to the listed entity during the review period)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011:

(Not Applicable to the listed entity during the review period)

- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable to the listed entity during the review period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

(Not Applicable to the listed entity during the review period)

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;

(Not Applicable to the listed entity during the review period)

- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015;
- (h) other regulations as applicable

and based on the above examination, I hereby report that, during the Review Period:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

Sr	Compliance	Regulation/	Deviations	Action	Туре	Details of	Fine	Observations	Management	Remarks
No	Requirement	Circular		Taken	of	Violation	Amount	/Remarks	Response	
	(Regulations	No.		By	Action			Of the	•	
	/circulars/			,				Practicing		
	guidelines							Company		
	including							Secretary		
	specific							(PCS)		
	clause)							, ,		
	Not Applicable									

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr	Observations/ Remarks of the	Observations made in	Compliance	Details of	Remedial	Comments of the
No	Practicing Company Secretary	the Secretarial	Requirement	violation /	actions,	PCS
	(PCS) in the previous reports)	Compliance report	(Regulations/	Deviations and	if any,	on the actions
		for the year ended	circulars/	actions	taken by	taken by the listed
		(The years are to	guidelines	taken /penalty	the listed	entity
		be mentioned)	including	imposed, if any,	entity	-
			specific clause)	on the listed entity	-	
Not Applicable						

(c) I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr.	Particulars	Compliance	Observations/
No.		status (Yes/ No/NA)	Remarks by PCS*
1	Secretarial Standard		
	The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	YES	-

EMAI ID: <u>csvivekvasani@gmail.com</u>



Sr.	Particulars	Compliance	Observations/ Remarks
No.		status (Yes/ No/NA)	by PCS*
2	<ul> <li>Adoption and timely updation of the Policies:</li> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</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	-
3	<ul> <li>Maintenance and disclosures on Website:</li> <li>The Listed entity 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	-
4	Disqualification of Directors:  None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	YES	-
5	Details related to Subsidiaries of listed entities have been examined w.r.t.:  (a) Identification of material subsidiary companies  (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	THERE ARE TWO SUBSIDIARY COMPANIES NAMELY 1. Akash Infra INC WHICH IS SUBSIDIARY OF THE COMPANY AND 2. Akash International LLC WHICH IS WHOLLY OWNED SUBSIDIARY OF THE COMPANY

EMAI ID: <u>csvivekvasani@gmail.com</u>

V. N. VASANI & ASSOCIATES

**COMPANY SECRETARIES** 

		COMPANT	SECKETARIES
6	Preservation of documents:		
	The listed entity 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.	YES	-
7	Performance Evaluation:		
	The listed entity 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.	YES	-
8	Related Party Transactions:  (a) The listed entity has obtained prior approval of Audit Committee for all Related Party Transactions;  (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.	YES	NONE
9	Disclosures of events or information:  The listed entity 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.	YES	-
10	Prohibition of Insider Trading:  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	-



11	Actions taken by SEBI or Stock Exchange(s), if any:		
	No action(s) has been taken against the listed entity/ 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)	YES	
	The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	NA	NO SUCH EVENT
12	Resignation of statutory auditors from the listed entity or its material subsidiaries:		
	In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(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 the LODR Regulations by listed entities	N.A.	NO SUCH EVENT
13	Additional Non-compliances, if any:		
	No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above	NA	NO SUCH NON- COMPLIANCE

Observations/Remarks by PCS are mandatory if the compliance status is provided as 'No' or 'NA'



#### 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 listed entity.
- 2. My responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- 3. I have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
- 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 listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

DATE: 27.05.2025

DATE: 27.05.2025

CS VIVEK VASANI

CS VIVEK VASANI

COMPANY SECRETARY

COP NUMBER: 12743

M NO ACS: 34219

PR NO: 1501/2021

UDIN: A034219G000460722

EMAI ID: csvivekvasani@gmail.com