

To,  
The Manager,  
The Department of Corporate Services  
BSE Limited  
Floor 25, P. J. Towers,  
Dalal Street, Mumbai – 400 001

**Scrip Code : 533271**

May 28, 2022

**Sub: Secretarial Compliance Report**

With reference to the captioned subject, please find enclosed Secretarial Compliance Report under regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended March 31, 2022.

Kindly take the same on your record.

Thanking you,

**For Ashoka Buildcon Limited**



**Manoj A. Kulkarni**  
(Company Secretary)  
ICSI Membership No. : FCS - 7377



To,  
The Manager,  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (East), Mumbai – 400 051

**Scrip Symbol : ASHOKA EQ.**

# SHARMA AND TRIVEDI LLP

(Registered with Limited Liability)

Company Secretaries, LLPIN: AAW-6850

C-316, 3<sup>rd</sup> Floor, Avior Corporate Park, Nirmal Galaxy, L.B.S. Marg, Mulund (W), Mumbai – 400 080

Tel: (+91 22) 2591 3041, email id- csllp108@gmail.com

## Secretarial Compliance Report of Ashoka Buildcon Limited for the year ended March 31, 2022

{Pursuant to Regulation 3.b. of the SEBI Circular No CIR / CFD/CMD1/ 27 / 2019 dated February 08, 2019 under SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 }

We, M/s. Sharma and Trivedi LLP, (LLPIN: AAW-6850), Company Secretaries, Mumbai, have examined:

- (a) all the documents and records made available to us and explanation provided by **Ashoka Buildcon Limited** having CIN:L45200MH1993PLC071970 (“the listed entity”):
- (b) the filings/ submissions made by the listed entity to the stock exchanges:
- (c) website of the listed entity (website address: <https://www.ashokabuildcon.com/>); and
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification;

for the Financial Year ended March 31, 2022 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**, as there was no instance during the year under review);
- (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**, as there was no instance during the year under review);
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (applicable upto 12<sup>th</sup> August, 2021 vide Notification No.: SEBI/LAD-NRO/GN/2021/40) and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (applicable w.e.f. from 13<sup>th</sup> August, 2021 vide Notification No.: SEBI/LAD-NRO/GN/2021/40); (**Not Applicable**, as there was no instance during the year under review);

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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (*Not Applicable*, as there was no instance during the year under review);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (*Not Applicable*, as there was no instance during the year under review);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018; and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the financial year ended 31<sup>st</sup> March, 2022:

- (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. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
1	Regulation 23 (9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:  The listed entity shall submit to the stock exchanges disclosures of related party transactions in the format as specified by the Board from time to time, the listed entity shall make such disclosures every six months within fifteen days from the date of publication of its standalone and consolidated financial results.	The Company has not filed the disclosure under Regulation 23 (9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with the Stock Exchanges within the prescribed time limit.	There was delay of 7 days in submission of disclosure under Regulation 23 (9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with the Stock Exchanges for the reasons beyond control, due to second wave of COVID 19 pandemic situation.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.

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(c) The following are the details of actions taken against the listed entity/ its Promoters/ Directors/ Material Subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	National Stock Exchange of India Limited (NSE) and BSE Limited (BSE)	The Company has filed the disclosure under Regulation 23 (9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with the Stock Exchanges after 7 days of the prescribed time limit.	The Company had received letter from NSE dated August 20, 2021 imposing penalty of Rs.35,000/- and from BSE email dated August 20, 2021 imposing penalty of Rs.35,000/- for 7 days' delay in submission of disclosure under Regulation 23 (9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with the Stock Exchanges.	The Company had submitted the disclosure to BSE and NSE with a delay of 7 days due to COVID 19 pandemic situation. Despite that the Company had paid the penalty of Rs.35,000/- levied by BSE & NSE both and submitted waiver request with BSE & NSE for waiver of Penalty, on account of the delay due to COVID-19 pandemic. Subsequently, NSE had waived the fine imposed on the Company and had refunded the entire amount of penalty. BSE has also waived the penalty and informed that the amount will be adjusted towards ALF (Annual Listing Fees) / other pending charges / fees payable, if any to the BSE.

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
<b>Not Applicable</b>				

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**We further report that** there was no event of appointment / re-appointment / resignation of Statutory Auditors of the Company during the period under review and the Company was in Compliance with Para 6(A) and 6(B) of the Circular No.: CIR/CFD/CMD1/114/2019 dated October 18, 2019.

**For Sharma and Trivedi LLP**  
**Company Secretaries**  
**(Unique ID: L2021MH011000)**



**Sachin Sharma**  
**Designated Partner**  
**ACS: 46900**  
**CP No.: 20423**  
**UDIN: A046900D000386426**

**PR : 1680/2022**

**Date: 25<sup>th</sup> May, 2022**  
**Place: Mumbai**