

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

**Scrip Code : 533271**

June 30, 2021

**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, 2021.

Kindly take the same on your record.

Thanking you,

For Ashoka Buildcon Limited



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



**Secretarial Compliance Report of Ashoka Buildcon Limited for the year ended  
March 31, 2021**

{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. S. Anantha & Ved LLP, (LLPIN:AAH-8229), Company Secretaries, Mumbai, have examined:

- (a) all the documents and records made available to us and explanation provided by **Ashoka Buildcon Limited** (“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/>);
- (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, 2021 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* for 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* for the year under review);

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- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 (*Not Applicable* for the year under review);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (*Not Applicable* for 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* for 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, 2021:

- (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
<b>Not Applicable</b>			

- (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.

- (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.
<b>Not Applicable</b>				

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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 31 <sup>st</sup> March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	As per Regulation 44 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the listed entity shall submit to the stock exchange, within 48 hours of conclusion of its General Meeting, details regarding the voting results in the format specified by the Board.  The Company has submitted the voting results after 48 hours for the Postal Ballot concluded on 01 <sup>st</sup> July, 2019. <i>(The above query was raised by NSE vide e-mail dated 04<sup>th</sup> July, 2019)</i>	As per Regulation 44 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the listed entity shall submit to the stock exchange, within 48 hours of conclusion of its General Meeting, details regarding the voting results in the format specified by the Board.  The Company has submitted the voting results after 48 hours for the Postal Ballot concluded on 01 <sup>st</sup> July, 2019. <i>(The above query was raised by NSE vide e-mail dated 04<sup>th</sup> July, 2019)</i>	The Company has submitted its reply on 06 <sup>th</sup> July, 2019 and no further clarification was sought by NSE in this regard.	--

**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 S. Anantha & Ved LLP**  
**Company Secretaries**




**Sachin Sharma**  
**Designated Partner**  
**ACS: 46900**  
**CP No.: 20423**  
**UDIN: A046900C000486350**

Date: 16<sup>th</sup> June, 2021  
 Place: Jodhpur