



**Ahluwalia Contracts
(India) Limited**
Engineering, Designing & Construction

Date: 26-05-2025

To,

Compliance Department
BSE Limited.
25th Floor, P.J. Towers
Dalal Street,
Mumbai - 400001

Compliance Department
National Stock Exchange of India
Ltd.
5th Floor, Exchange Plaza,
Bandra Kurla Complex,
Bandra (East) Mumbai- 400051

Compliance Department
Calcutta Stock Exchange Ltd
7, Lyons Range, Dalhousie,
Murgighata, B B D Bagh,
Kolkata, West Bengal –
700001

Sub: -Annual Secretarial Compliance Report for the financial year ended 31st March, 2025

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed Annual Secretarial Compliance Report dated on 26-05-2025 issued by Mr. Santosh Kumar Pradhan, Practicing Company Secretary for the financial year ended 31st March, 2025.

Kindly take the above information on your record.

Yours faithfully,
For Ahluwalia Contracts (India) Ltd

(Vipin Kumar Tiwari)
Company Secretary



Secretarial Compliance Report
Of
AHLUWALIA CONTRACTS (INDIA) LIMITED

(CIN: L45101DL1979PLC009654)

For the Financial Year
Ended 31st March, 2025

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Ahluwalia Contracts (India) Limited (CIN: L45101DL1979PLC009654) (hereinafter referred to as the Listed Entity)**, having its Registered Office at A-177, Okhla Industrial Estate, Phase-I, New Delhi-110020. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/ statutory compliances and to provide our observation thereon. Based on our verification of the listed entity's books, paper, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2025 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I, Santosh Kumar Pradhan, Company Secretary in Practice, have examined:

(a) All the documents and records made available to me and explanation provided by **Ahluwalia Contracts (India) Limited (CIN: L45101DL1979PLC009654) (hereinafter referred to as the Listed Entity)**.

(b) The filling/ 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 report for the Financial Year ended 31st March, 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 Regulation, 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;



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- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not applicable during the Review period.**
- (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 during the Review period.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not applicable during the Review period.**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021:- **Not applicable during the Review period.**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulation, 2018 and
- (i) Other regulations as applicable

and circulars/ guidelines issued thereunder and based on the above examination, I hereby report that, during the Review Period:

- I. (a) The Listed Entity has complied with the provisions of the above Regulations and the Circulars/Guidelines issued thereunder;

The Listed Entity has received Letters, clarifications and E-mails from the Stock Exchanges, which were duly replied by the Company during the Review period.

- (b) The listed entity has taken the following action to comply with the observations made in previous report:

Sr. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31 st March, 2024	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / Deviations and actions taken /penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
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1.	The Listed entity has submitted the related party transaction report in XBRL format with BSE & NSE on 29 th May, 2023 instead of 27 th May, 2023 as required under Regulation 23(9) of LODR.	The Listed entity has submitted the related party transaction report in XBRL format with BSE & NSE on 29 th May, 2023 instead of 27 th May, 2023 as required under Regulation 23(9) of LODR.	Regulation 23(9) of LODR	Delay in submission of Related Party transaction report for the 6 months ended 31 st March, 2023. Rs. 5,900/- (inclusive of GST) by both the Stock Exchanges respectively	The Listed entity has already paid the penalty amount to both the Stock exchanges and subsequent Related party Disclosure was made within the stipulated time period.	The Listed entity has already paid the penalty amount to both the Stock exchanges and subsequent Related party Disclosure Report for the half year ended 30 th September, 2024 was made within the stipulated time period.
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II. I hereby report that, during the Review Period the compliance status of the listed entity with the following requirements is as appended below:

Sr. No	Particulars	Compliance Status (Yes/No/NA)	Observations/Remark by PCS
1.	<u>Secretarial Standard:</u> The compliances of listed entity are in accordance with the applicable Secretarial Standard (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	Nil
2.	<u>Adoption and timely updation of the Policies:</u> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.	Yes	Nil



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	<ul style="list-style-type: none"> All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circular/ guidelines issued by SEBI. 		
3.	<u>Maintenance and disclosure on website:</u> <ul style="list-style-type: none"> The listed entity is maintaining a functional website. Timely dissemination of the documents /information under a separate section on the website. 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. 	Yes	Nil
4.	<u>Disqualification of Director:</u> None of the Director of the Listed Entity is/ are disqualified under section 164 of the Companies Act, 2013 as confirmed by the listed entity.	Yes	Nil
5.	<u>Details related to subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	Yes	Nil
6.	<u>Preservation of Documents:</u> 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	Nil
7.	<u>Performance Evaluation:</u> 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	Nil



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8.	<u>Related party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; (b) In case no prior approval has been obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved /ratified/ rejected by the Audit Committee,.	Yes	Nil
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulation, 2015 within the time limits prescribed thereunder.	Yes	Nil
10.	<u>Prohibitions of insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Nil
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Action 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 The actions taken against the Listed entity/ its promoters/ Directors/ subsidiaries either by SEBO or Stock exchange are specified in the last column.	Yes	Nil
12.	<u>Resignation of Statutory Auditors from the Listed entity or its material subsidiaries:</u> 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 provision of the LODR Regulations by the Listed Entities.	NA	There was no resignation of Statutory Auditors in the Listed entity or its material subsidiaries during the



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			Review Period
13.	<u>Additional Non- compliances, if any:</u>	Yes	Nil
	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. except as reported above.		


I further report that the Listed Entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of Regulation 46 (2)(za) of the LODR Regulations.: Not Applicable

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. We have not verified the correctness and appropriateness of Financial Records and Books of Accounts 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.

Place: Ghaziabad
Date: 26.05.2025

For Santosh Kumar Pradhan
Company Secretaries


Santosh Kumar Pradhan
Proprietor
C. P. No. : 7647
FCS No. F6973
P.R. No. 1388/2021
UDIN: F006973G000435764