



PIYUSH PRAJAPATI & ASSOCIATES

Company Secretaries

"Akshat House", First Floor, Plot No. 220, Sector 1-A, Gandhidham - 370 201.
Tel. : +91 - 2836 - 226699 Cell. : +91 - 99780 05437 Email : cspiyushprajapati@gmail.com

SECRETARIAL COMPLIANCE REPORT OF ACCURACY SHIPPING LIMITED FOR THE YEAR ENDED 31ST MARCH, 2021

I, Piyush Prajapati Proprietor of M/s Piyush Prajapati & Associates, Company Secretaries in Practice have examined all the documents and records made available to us and explanation provided by M/s. Accuracy Shipping Limited ("the listed entity"); the filings/ submissions made by the listed entity to the stock exchanges; website of the listed entity; any other document/ filing (as may be relevant) which had been relied upon to make this certification for the year ended 31st March, 2021 ("Review Period") in respect of compliance with the provisions of (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act"); and (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA").

The specific Regulations, Circulars and Guidelines issued were examined include the below:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**LODR**);
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018-*Not applicable for the period 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 period under review*;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - *Not applicable for the period under review*;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008- *Not applicable for the period 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 period under review*;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and circulars/ guidelines issued there under;

Based on the above examination w.r.t provisions from (a) to (j) related to SEBI Act, We hereby report that, during the Review Period:





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(a) the listed entity has complied with the provisions of the above Regulations, Circulars and Guidelines issued there under, except in respect of matters specified below :

Sl	Compliance Requirement	Deviations	Remarks of PCS
1.	<p>As per Regulation 7(2) (a) of SEBI Prohibition of Insider Trading (PIT) Regulations, 2015, Every promoter, employee and director of every company shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified</p> <p>And as per Regulation 7(2) (b) of SEBI Prohibition of Insider Trading (PIT) Regulations, 2015 Every company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.</p>	<p>Promoter and Company failed to disclose in a given period of time as per Regulation 7(2) (a) and Regulation 7(2) (b)</p>	<p>We have been given to understand that due to several factors beyond the control of the management viz., the Covid -19 Pandemic</p> <p>However, we have been given to understand that the Company has disclosed the same as soon as it comes to their notice.</p>





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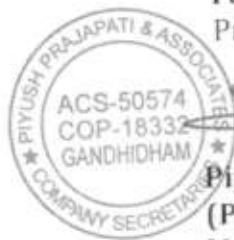
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my/our examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ 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 there under:

Sl	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.
NA				


The listed entity has taken the following actions to comply with the observations made impervious reports:

Sl	Observations of PCS in the previous reports	Observations made in SAR 2020	Actions taken by the listed entity, if any	Comments of PCS on Actions taken
NA				

Place : Gandhidham
Date : 30th June, 2021



For Piyush Prajapati & Associates
Practicing Company Secretary


Piyush Babubhai Prajapati
(Proprietor)

Membership No. : A50574

C.P. No.: 18332

UDIN- A050574C000551998