



Accuracy Shipping Limited

P E R F E C T I O N I S A N A T T I T U D E

May 30th, 2024

To,
National Stock Exchange Of India Ltd
Exchange Plaza, Plot No. C/1, G Block,
Bandra Kurla Complex,
Bandra (East), Mumbai – 400 051

NSE Symbol: ACCURACY

Sub: Annual Secretarial Compliance Report for the financial year 2023-24

Dear Sir / Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report of the Company dated May 30th, 2024 issued by M/s Piyush Prajapati & Associates, Practicing Company Secretaries, for the financial year 2023-24.

This is for your information and records.

Yours faithfully,
For Accuracy Shipping Limited

VINAY DINANATH TRIPATHI
(Managing director)
DIN : 02344536

GST No : Gujarat - 24AAHCA3717A1ZB,
GST No : Maharashtra - 27AAHCA3717A1Z5,
GST No : Tamilnadu - 33AAHCA3717A1ZC,
GST No : West Bengal - 19AAHCA3717A1Z2.

Ph. : +91 2836 258251, 258252
Fax : +91 2836 258253
Mo : +91 99093 32446
E-mail : admin@aslindia.net
Web. : www.aslindia.net

PAN No. AAHCA3717A
Reg. No. MTO/DGS/883/APR/2022
TAN No. RKTA02447E
CIN No. L52321GJ2008PLC05532

(Formerly Known As Accuracy Shipping Pvt.Ltd)
Head Office : ASL House, Plot No. 11, Survey No. 42, Nr. Genus Factory,
Indian Oil Petrol Pump Road, Meghpar Borichi, Anjar Kutch - 370 110. (Gujarat, India)
Subject To Gandhidham Jurisdiction



Secretarial Compliance Report of Accuracy Shipping Limited for the financial year ended 31st March, 2024

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Accuracy Shipping Limited** (hereinafter referred as 'the listed entity'), having its Registered Office at Survey No : 42, Plot No : 11 Meghpar Borichi, Anjar , Kachchh GJ 370110, IN, Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, 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, we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March 2024, complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I Piyush Babubhai Prajapati, Proprietor of M/s Piyush Prajapati & Associates, Company Secretaries in Practice, have examined:

(a) all the documents and records made available to us and explanation provided by **ACCURACY SHIPPING LIMITED (CIN-L52321GJ2008PLC055322)** having its Registered office at Survey No : 42, Plot No : 11 Meghpar Borichi, Anjar , Kachchh GJ 370110, IN (herein after referred as "the listed entity").

(b) the filings/ submissions made by the listed entity to the stock exchanges,

(c) website of the listed entity, (website address: www.aslindia.net)

(d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st march, 2024 * 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");





PIYUSH PRAJAPATI & ASSOCIATES

Company Secretaries

Office No. 8, Plot No. 306, First Floor, Ward 12-B, "Hari Krupa Complex", Gandhidham - 370 201.
Cell : +91 - 99780 05437 / 99258 35529 Email : cspiyushprajapati@gmail.com

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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; *Not Applicable during the year under review*
- (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 and Sweat Equity) Regulations, 2021; *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 Securities) Regulations, 2021; *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 thereunder;

and circulars/ guidelines issued thereunder; and based on the examination of the above referred documents and records, and pursuant to Circular Ref. No. NSE/CML/ 2023/21 dated March 16, 2023, issued by National Stock Exchange of India Limited and Notice No. 20230316-14 dated March 16, 2023, issued by BSE Limited and the format of the Certificate approved by the Council of the Institute of Company Secretaries of India on May 10, 2024, Compliance Status of the Company is appended as under: and circulars/ guidelines issued thereunder;





PIYUSH PRAJAPATI & ASSOCIATES

Company Secretaries

Office No. 8, Plot No. 306, First Floor, Ward 12-B, "Hari Krupa Complex", Gandhidham - 370 201.
Cell : +91 - 99780 05437 / 99258 35529 Email : cspiyushprajapati@gmail.com

We 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 the following:-

Sr. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Remarks
There was no reportable event requiring compliance during the Review Period										

(b) 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 March, 2023 (The years are to be mentioned)	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 Practicing Company Secretary on the actions taken by the listed entity
1	The Company has delayed in filling of Related party transaction disclosure which is violation of Regulation 23(9) of SEBI (LODR) Regulation, 2015 ("Listing Regulation"). However, the Company has filed the same and also paid fine levied by the NSE.	The Company has delayed in filling of Related party transaction disclosure which is violation of Regulation 23(9) of SEBI (LODR) Regulation, 2015 ("Listing Regulation"). However, the Company has filed the same and also paid fine levied by the NSE.	Regulation 23(9) of SEBI (LODR) Regulation, 2015 ("Listing Regulation")	There was delay in filling of Related party transaction disclosure for March 31, 2022 quarter and it is violation of Regulation 23(9) of SEBI (LODR) Regulation, 2015 ("Listing Regulation") and fined Rs. 5000 per day on the Company as the disclosure was filed within 16 days delay, the penalty was 5000 +18% GST aggregating to Rs. 94,400.	The Company has delayed in filling of Related party transaction disclosure and then the Company has filed the same and also paid fine levied by the NSE.	The Company has delayed in filling of Related party transaction disclosure and then the Company has filed the same and also paid fine levied by the NSE.





PIYUSH PRAJAPATI & ASSOCIATES

Company Secretaries

Office No. 8, Plot No. 306, First Floor, Ward 12-B, "Hari Krupa Complex", Gandhidham - 370 201.
Cell. : +91 - 99780 05437 / 99258 35529 Email : cspiyushprajapati@gmail.com

I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	None
2.	Adoption and timely updation of the Policies: - All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities -All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes Yes	None None
3.	Maintenance and disclosures on Website: -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 Yes Yes	None None None
4.	Disqualification of Director: None of the Directors of the Company is disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: a) Identification of material subsidiary companies	Not Applicable	The Listed Entity does not have a Material Subsidiary Company.





PIYUSH PRAJAPATI & ASSOCIATES

Company Secretaries

Office No. 8, Plot No. 306, First Floor, Ward 12-B, "Hari Krupa Complex", Gandhidham - 370 201.
Cell. : +91 - 99780 05437 / 99258 35529 Email : cspiyushprajapati@gmail.com

	b) Disclosure requirement of material as well as other subsidiaries	Yes	
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	None
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	None
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes Yes	None None
9.	Disclosure 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	None
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	None
11.	Actions taken by SEBI or Stock Exchange(s), if any: No Actions 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.	NA	No such instance found during review period





PIYUSH PRAJAPATI & ASSOCIATES

Company Secretaries

Office No. 8, Plot No. 306, First Floor, Ward 12-B, "Hari Krupa Complex", Gandhidham - 370 201.
Cell. : +91 - 99780 05437 / 99258 35529 Email : cspiyushprajapati@gmail.com


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.	NA	No such instance found during review period
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	No such instance found during review period

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. Our 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 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 (LODR) 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.



For Piyush Prajapati & Associates
Practicing Company Secretary


Piyush Babubhai Prajapati
(Proprietor)
Membership No. F12711
C.P. No. 18332
PR.NO. 1443/2021
UDIN: F012711F000495039

Place: Gandhidham
Date: 30th May, 2024