

| General information about company | |
|--|---------------------------------------|
| Scrip code | 532762 |
| NSE Symbol | ACE |
| MSEI Symbol | NOTLISTED |
| ISIN | INE731H01025 |
| Name of the entity | ACTION CONSTRUCTION EQUIPMENT LIMITED |
| Date of start of financial year | 01-04-2020 |
| Date of end of financial year | 31-03-2021 |
| Reporting Quarter | Half Yearly |
| Date of Report | 30-09-2020 |
| Risk management committee | Not Applicable |
| Market Capitalisation as per immediate previous Financial Year | Top 1000 listed entities |

Annexure I

Annexure I to be submitted by listed entity on quarterly basis

I. Composition of Board of Directors

| Disclosure of notes on composition of board of directors explanatory | | | | | | | | | | | | | | Textual Information(1) | | | | | | |
|--|-----------------|----------------------|------------|----------|-------------------------|-------------------------|-------------------------|---------------|---|------------------------------------|-----------------------------|------------------------|-------------------|--------------------------------|--|---|---|--|-----------------------------|-----------------------------|
| Whether the listed entity has a Regular Chairperson | | | | | | | | | | | | | | Yes | | | | | | |
| Whether Chairperson is related to MD or CEO | | | | | | | | | | | | | | Yes | | | | | | |
| Sr | Title (Mr / Ms) | Name of the Director | PAN | DIN | Category 1 of directors | Category 2 of directors | Category 3 of directors | Date of Birth | Whether special resolution passed? [Refer Reg. 17(1A) of Listing Regulations] | Date of passing special resolution | Initial Date of appointment | Date of Re-appointment | Date of cessation | Tenure of director (in months) | No of Directorship in listed entities including this listed entity (Refer Regulation 17A of Listing Regulations) | No of Independent Directorship in listed entities including this listed entity (Refer Regulation 17A(1) of Listing Regulations) | Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations) | No of post of Chairperson in Audit/ Stakeholder Committee held in listed entities including this listed entity (Refer Regulation 26(1) of Listing Regulations) | Notes for not providing PAN | Notes for not providing DIN |
| 1 | Mr | Vijay Agarwal | AAZPA6461C | 00057634 | Executive Director | Chairperson | MD | 13-01-1949 | NA | | 13-01-1995 | 01-10-2018 | | | 1 | 0 | 1 | 0 | | |
| 2 | Mrs | Mona Agarwal | AANPA6595R | 00057653 | Executive Director | Not Applicable | | 18-11-1955 | NA | | 13-01-1995 | 01-10-2018 | | | 1 | 0 | 0 | 0 | | |
| 3 | Mr | Sorab Agarwal | AENPA0418H | 00057666 | Executive Director | Not Applicable | | 27-02-1977 | NA | | 20-03-1998 | 01-10-2018 | | | 1 | 0 | 1 | 0 | | |
| 4 | Mrs | Surbhi Garg | AGTPG2415J | 01558782 | Executive Director | Not Applicable | | 11-01-1978 | NA | | 12-11-2011 | 01-04-2020 | | | 1 | 0 | 0 | 0 | | |

I. Composition of Board of Directors

Disclosure of notes on composition of board of directors explanatory

Wether the listed entity has a Regular Chairperson

| Sr | Title (Mr / Ms) | Name of the Director | PAN | DIN | Category 1 of directors | Category 2 of directors | Category 3 of directors | Date of Birth | Whether special resolution passed? [Refer Reg. 17(1A) of Listing Regulations] | Date of passing special resolution | Initial Date of appointment | Date of Re-appointment | Date of cessation | Tenure of director (in months) | No of Directorship in listed entities including this listed entity (Refer Regulation 17A of Listing Regulations) | No of Independent Directorship in listed entities including this listed entity (Refer Regulation 17A(1) of Listing Regulations) | Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations) | No of post of Chairperson in Audit/ Stakeholder Committee held in listed entities including this listed entity (Refer Regulation 26(1) of Listing Regulations) | Notes for not providing PAN | Notes for not providing DIN |
|----|-----------------|------------------------|------------|----------|--------------------------------------|-------------------------|-------------------------|---------------|---|------------------------------------|-----------------------------|------------------------|-------------------|--------------------------------|--|---|---|--|-----------------------------|-----------------------------|
| 5 | Mr | Subhash Chander Verma | AAEPV1937D | 00098019 | Non-Executive - Independent Director | Not Applicable | | 13-04-1945 | Yes | 30-03-2019 | 06-10-2005 | 25-09-2015 | 25-09-2020 | 60 | 1 | 1 | 2 | 1 | | |
| 6 | Mr | Girish Narain Mehra | AAEPM4191N | 00059311 | Non-Executive - Independent Director | Not Applicable | | 24-11-1932 | Yes | 30-03-2019 | 06-10-2005 | 25-09-2015 | 25-09-2020 | 60 | 4 | 3 | 7 | 4 | | |
| 7 | Mr | Keshav Chandra Agrawal | AFSPA5333F | 00098143 | Non-Executive - Independent Director | Not Applicable | | 15-07-1941 | Yes | 30-03-2019 | 06-10-2005 | 25-09-2015 | 25-09-2020 | 60 | 1 | 1 | 0 | 0 | | |
| 8 | Mr | Avinash Parkash Gandhi | AAAPG2351A | 00161107 | Non-Executive - Independent Director | Not Applicable | | 01-10-1938 | Yes | 27-09-2019 | 01-10-2019 | 01-10-2019 | | 60 | 5 | 5 | 7 | 1 | | |

I. Composition of Board of Directors

Disclosure of notes on composition of board of directors explanatory

Wether the listed entity has a Regular Chairperson

| Sr | Title (Mr / Ms) | Name of the Director | PAN | DIN | Category 1 of directors | Category 2 of directors | Category 3 of directors | Date of Birth | Whether special resolution passed? [Refer Reg. 17(1A) of Listing Regulations] | Date of passing special resolution | Initial Date of appointment | Date of Re-appointment | Date of cessation | Tenure of director (in months) | No of Directorship in listed entities including this listed entity (Refer Regulation 17A of Listing Regulations) | No of Independent Directorship in listed entities including this listed entity (Refer Regulation 17A(1) of Listing Regulations) | Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations) | No of post of Chairperson in Audit/ Stakeholder Committee held in listed entities including this listed entity (Refer Regulation 26(1) of Listing Regulations) | Notes for not providing PAN | Notes for not providing DIN |
|----|-----------------|----------------------|------------|----------|--------------------------------------|-------------------------|-------------------------|---------------|---|------------------------------------|-----------------------------|------------------------|-------------------|--------------------------------|--|---|---|--|-----------------------------|-----------------------------|
| 9 | Mrs | Divya Singal | AAUPS9552R | 08722144 | Non-Executive - Independent Director | Not Applicable | | 21-03-1961 | NA | | 01-04-2020 | 01-04-2020 | | 60 | 1 | 1 | 2 | 1 | | |
| 10 | Mr | Shrinivas Vashisht | ABAPV7554P | 06572418 | Non-Executive - Independent Director | Not Applicable | | 08-11-1955 | NA | | 24-09-2020 | 24-09-2020 | | 60 | 1 | 1 | 0 | 0 | | |

Text Block

| | |
|------------------------|--|
| Textual Information(1) | <p>Two consecutive terms of appointment as Independent Director of the following Directors in the Company have been completed on Sept. 24, 2020.</p> <p>1.Mr. Girish Narain Mehra</p> <p>2.Mr. Subhash Chander Verma</p> <p>3.Mr. Keshav Chandra Agrawal</p> <p>Further, due to retirement of aforesaid Directors, there will be requirement of Composition of Board of Directors and re-constitution of various relevant Committees. Pursuant to the SEBI LODR Regulations, 2015, same will be complied within specified time period.</p> |
|------------------------|--|

Audit Committee Details

| Whether the Audit Committee has a Regular Chairperson | | | | | Yes | | |
|---|------------|---------------------------|--------------------------------------|-------------------------|---------------------|-------------------|------------------------|
| Sr | DIN Number | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of Appointment | Date of Cessation | Remarks |
| 1 | 00098019 | Subhash Chander Verma | Non-Executive - Independent Director | Chairperson | 25-09-2015 | 25-09-2020 | Textual Information(1) |
| 2 | 00059311 | Girish Narain Mehra | Non-Executive - Independent Director | Member | 25-09-2015 | 25-09-2020 | Textual Information(2) |
| 3 | 00057634 | Vijay Agarwal | Executive Director | Member | 01-10-2018 | | |
| 4 | 00161107 | Avinash Parkash Gandhi | Non-Executive - Independent Director | Member | 01-10-2019 | | |
| 5 | 08722144 | Divya Singal | Non-Executive - Independent Director | Member | 01-04-2020 | | |

Sr Text Block

| | |
|------------------------|--|
| Textual Information(1) | Two consecutive terms of appointment as Independent Director of Mr. Subhash Chander Verma has been completed on 24.09.2020, i.e. his directorship in the Compnay has been ceased w.e.f. 25.09.2020 |
| Textual Information(2) | Two consecutive terms of appointment as Independent Director of Mr. Girish Narain Mehra has been completed on 24.09.2020, i.e. his directorship in the Compnay has been ceased w.e.f. 25.09.2020. |

| Nomination and remuneration committee | | | | | | | |
|---|------------|---------------------------|--------------------------------------|-------------------------|---------------------|-------------------|------------------------|
| Whether the Nomination and remuneration committee has a Regular Chairperson | | | | | Yes | | |
| Sr | DIN Number | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of Appointment | Date of Cessation | Remarks |
| 1 | 08722144 | Divya Singal | Non-Executive - Independent Director | Chairperson | 01-04-2020 | | |
| 2 | 00098019 | Subhash Chander Verma | Non-Executive - Independent Director | Member | 25-09-2015 | 25-09-2020 | Textual Information(1) |
| 3 | 00059311 | Girish Narain Mehra | Non-Executive - Independent Director | Member | 25-09-2015 | 25-09-2020 | Textual Information(2) |

Sr Text Block

| | |
|------------------------|--|
| Textual Information(1) | Two consecutive terms of appointment as Independent Director of Mr. Subhash Chander Verma has been completed on 24.09.2020, i.e. his directorship in the Compnay has been ceased w.e.f. 25.09.2020 |
| Textual Information(2) | Two consecutive terms of appointment as Independent Director of Mr. Girish Narain Mehra has been completed on 24.09.2020, i.e. his directorship in the Compnay has been ceased w.e.f. 25.09.2020. |

| Stakeholders Relationship Committee | | | | | | | |
|---|------------|---------------------------|--------------------------------------|-------------------------|---------------------|-------------------|------------------------|
| Whether the Stakeholders Relationship Committee has a Regular Chairperson | | | | | Yes | | |
| Sr | DIN Number | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of Appointment | Date of Cessation | Remarks |
| 1 | 08722144 | Divya Singal | Non-Executive - Independent Director | Chairperson | 01-04-2020 | | |
| 2 | 00098019 | Subhash Chander Verma | Non-Executive - Independent Director | Member | 25-09-2015 | 25-09-2020 | Textual Information(1) |
| 3 | 00057666 | Sorab Agarwal | Executive Director | Member | 01-10-2018 | | |

Sr Text Block

| | |
|------------------------|---|
| Textual Information(1) | Two consecutive terms of appointment as Independent Director of Mr. Subhash Chander Verma has been completed on 24.09.2020, i.e. his directorship in the Compnay has been ceased w.e.f. 25.09.2020. |
|------------------------|---|

| Risk Management Committee | | | | | | | |
|---|------------|---------------------------|-------------------------|-------------------------|---------------------|-------------------|---------|
| Whether the Risk Management Committee has a Regular Chairperson | | | | | | | |
| Sr | DIN Number | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of Appointment | Date of Cessation | Remarks |

| Corporate Social Responsibility Committee | | | | | | | |
|---|------------|---------------------------|--------------------------------------|-------------------------|---------------------|-------------------|------------------------|
| Whether the Corporate Social Responsibility Committee has a Regular Chairperson | | | | | Yes | | |
| Sr | DIN Number | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of Appointment | Date of Cessation | Remarks |
| 1 | 08722144 | Divya Singal | Non-Executive - Independent Director | Chairperson | 01-04-2020 | | |
| 2 | 00098143 | Keshav Chandra Agrawal | Non-Executive - Independent Director | Member | 25-09-2015 | 25-09-2020 | Textual Information(1) |
| 3 | 00057653 | Mona Agarwal | Executive Director | Member | 01-10-2018 | | |

Sr Text Block

| | |
|------------------------|--|
| Textual Information(1) | Two consecutive terms of appointment as Independent Director of Keshav Chandra Agrawal has been completed on 24.09.2020, i.e. his directorship in the Company has been ceased w.e.f. 25.09.2020. |
|------------------------|--|

| Other Committee | | | | | | |
|-----------------|------------|---------------------------|-------------------------|-------------------------|-------------------------|---------|
| Sr | DIN Number | Name of Committee members | Name of other committee | Category 1 of directors | Category 2 of directors | Remarks |
| | | | | | | |

Annexure 1

Annexure 1

III. Meeting of Board of Directors

| Disclosure of notes on meeting of board of directors explanatory | | | | | | | |
|--|---|--|---|------------------------------|--|------------------------------|---|
| Sr | Date(s) of meeting (if any) in the previous quarter | Date(s) of meeting (if any) in the current quarter | Maximum gap between any two consecutive (in number of days) | Notes for not providing Date | Whether requirement of Quorum met (Yes/No) | Number of Directors present* | No. of Independent Directors attending the meeting* |
| 1 | 15-06-2020 | | | | Yes | 9 | 5 |
| 2 | | 10-08-2020 | 55 | | Yes | 9 | 5 |

Annexure 1

IV. Meeting of Committees

| Disclosure of notes on meeting of committees explanatory | | | | | | | | |
|--|-------------------|---|---|-------------------------|-------------------------------|--|------------------------------|---|
| Sr | Name of Committee | Date(s) of meeting (Enter dates of Previous quarter and Current quarter in chronological order) | Maximum gap between any two consecutive (in number of days) | Name of other committee | Reason for not providing date | Whether requirement of Quorum met (Yes/No) | Number of Directors present* | No. of Independent Directors attending the meeting* |
| 1 | Audit Committee | 15-06-2020 | | | | Yes | 5 | 4 |
| 2 | Audit Committee | 10-08-2020 | 55 | | | Yes | 5 | 4 |

Annexure 1

V. Related Party Transactions

| Sr | Subject | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. |
|----|--|-------------------------------|--|
| 1 | Whether prior approval of audit committee obtained | Yes | |
| 2 | Whether shareholder approval obtained for material RPT | NA | |
| 3 | Whether details of RPT entered into pursuant to omnibus approval have been reviewed by Audit Committee | Yes | |

Annexure 1

VI. Affirmations

| Sr | Subject | Compliance status (Yes/No) |
|----|--|----------------------------|
| 1 | The composition of Board of Directors is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015 | Yes |
| 2 | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015 a. Audit Committee | Yes |
| 3 | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. b. Nomination & remuneration committee | Yes |
| 4 | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. c. Stakeholders relationship committee | Yes |
| 5 | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. d. Risk management committee (applicable to the top 500 listed entities) | NA |
| 6 | The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015. | Yes |
| 7 | The meetings of the board of directors and the above committees have been conducted in the manner as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015. | Yes |
| 8 | This report and/or the report submitted in the previous quarter has been placed before Board of Directors. | Yes |

Annexure 1

| Sr | Subject | Compliance status |
|----|-------------------|--|
| 1 | Name of signatory | Anil Kumar |
| 2 | Designation | Company Secretary and Compliance Officer |

Annexure III

III. Affirmations

| Sr | Particulars | Regulation Number | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. |
|--------------------------------------|--|--------------------------------------|-------------------------------|--|
| 1 | Copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report, business responsibility report displayed on website | 46(2) | Yes | |
| 2 | Presence of Chairperson of Audit Committee at the Annual General Meeting | 18(1)(d) | Yes | |
| 3 | Presence of Chairperson of the nomination and remuneration committee at the annual general meeting | 19(3) | Yes | |
| 4 | Presence of Chairperson of the Stakeholder Relationship committee at the annual general meeting | 20(3) | Yes | |
| 5 | Whether "Corporate Governance Report" disclosed in Annual Report | 34(3) read with para C of Schedule V | Yes | |
| Any other information to be provided | | | | |

Annexure III

| | | |
|---|-------------------|--|
| 1 | Name of signatory | Anil Kumar |
| 2 | Designation | Company Secretary and Compliance Officer |

Signatory Details

| | |
|-----------------------|--|
| Name of signatory | Anil Kumar |
| Designation of person | Company Secretary and Compliance Officer |
| Place | PALWAL |
| Date | 13-10-2020 |