

Format to be submitted by listed entity on quarterly basis

1. Name of Listed Entity - Action Construction Equipment Limited
2. Quarter ending - 31-Mar-2025

i. Composition Of Board Of Director

Title (Mr/Ms)	Name of the Director	DIN	PAN	Categ ory (Chair perso n /Execut ive/No n- Executi ve/ Indepe ndent/ Nomin ee)	Sub Cat ego ry	Initial Date of Appoin tment	Date of Re- appoint ment	D at e of ce ss ati on	Ten ure	Date of Birth	Wh eth er spe cial res olut ion pas sed ?	Date of passing special resolutio n	No. of Direc torshi p in listed entiti es inclu ding this listed entity	No of Indep ende nt Direc torshi p in listed entiti es inclu ding this listed entity	No of memb ershi ps in Audit / Stake holde r Com mitte e(s) inclu ding this listed entity	No of post of Chairpe rson in Audit/ Stakeho lder Commit tee held in listed entities includin g this listed entity	Memb ership in Comm ittees of the Comp any	R e m a r k s
Mr.	Vijay Agarwal	00057634		C & ED	MD	13-Jan- 1995	01-Oct- 2023			13-Jan- 1949	NA		1	0	1	0	AC,RC	
Mrs.	Mona Agarwal	00057653		ED		13-Jan- 1995	01-Oct- 2023			18-Nov- 1955	NA		1	0	0	0		
Mr.	Sorab Agarwal	00057666		ED		20-Mar- 1998	01-Oct- 2023			27-Feb- 1977	NA		1	0	1	0	SC,RC	
Mrs.	Surbhi Garg	01558782		ED		12-Jan- 2011	01-Apr- 2020			11-Jan- 1978	NA		1	0	0	0		
Mr.	Avinash Parkash Gandhi	00161107		ID		01-Oct- 2019	01-Oct- 2024		60	01-Oct- 1938	Yes	27-Aug- 2024	2	2	4	2	AC,SC,N RC	
Mrs.	Divya Singal	08722144		ID		01-Apr- 2020	01-Apr- 2020		60	21-Mar- 1961	NA		1	1	1	1	SC,RC,N RC	
Mr.	Shriniwas Vashisht	06572418		ID		24-Sep- 2020	24-Sep- 2020		60	08-Nov- 1955	NA		1	1	1	0	AC,NRC	
Mr.	Jagan Nath Chamber	08841478		ID		06-Nov- 2020	06-Nov- 2020		60	15-May- 1954	NA		1	1	1	0	AC	

Company Remarks

Whether Regular chairperson appointed	Yes
Whether Chairperson is related to MD or CEO	Yes

Note- The Members of the Company in thier 30th Annual General Meeting (AGM) held on 27th August 2024 has approved the re-appointments of Mrs. Surbhi Garg as whole Time Director w.e.f. 01.04.2025 for a term of five years and Mrs. Divya Singal as Non-Executive-Independent Director w.e.f. 01.04.2025 for a term of five years.

ii. Composition of Committees

A. Audit Committee

Sr. No.	Name of Committee members	Category	Chairperson/Member	Date of Appointment	Date of Cessation
1	Avinash Parkash Gandhi	ID	Chairperson	01-Oct-2019	
2	Shriniwas Vashisht	ID	Member	24-Sep-2020	
3	Jagan Nath Chamber	ID	Member	06-Nov-2020	
4	Vijay Agarwal	ED	Member	01-Oct-2018	

Company Remarks	
Whether Regular chairperson appointed	Yes

B. Stakeholders Relationship Committee

Sr. No.	Name of Committee members	Category	Chairperson/Member	Date of Appointment	Date of Cessation
1	Divya Singal	ID	Chairperson	01-Apr-2020	
2	Avinash Parkash Gandhi	ID	Member	01-Oct-2019	
3	Sorab Agarwal	ED	Member	01-Oct-2018	

Company Remarks	
Whether Regular chairperson appointed	Yes

C. Risk Management Committee

Sr. No.	Name of Committee members	Category	Chairperson/Member	Date of Appointment	Date of Cessation
1	Vijay Agarwal	C & ED	Chairperson	28-May-2021	
2	Sorab Agarwal	ED	Member	28-May-2021	
3	Divya Singal	ID	Member	28-May-2021	

Company Remarks	
Whether Regular chairperson appointed	Yes

D. Nomination and Remuneration Committee

Sr. No.	Name of Committee members	Category	Chairperson/Member	Date of Appointment	Date of Cessation
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1	Shriniwas Vashisht	ID	Chairperson	24-Sep-2020	
2	Divya Singal	ID	Member	01-Apr-2020	
3	Avinash Parkash Gandhi	ID	Member	01-Oct-2019	

E. Corporate Social Responsibility Committee

Sr. No.	Name of Committee members	Category	Chairperson/Member	Date of Appointment	Date of Cessation
1	Divya Singal	ID	Chairperson	01-Apr-2020	
2	Jagan Nath Chamber	ID	Member	06-Nov-2020	
3	Mona Agarwal	ED	Member	01-Oct -2018	

Company Remarks	
Whether Regular chairperson appointed	Yes

F. Meeting of Board of Directors

Date(s) of meeting (Enter dates of Previous quarter and Current quarter in chronological order)	Whether requirement of Quorum met (Yes/No)	Total Number of Directors as on date of the meeting	Number of Directors present (All directors including Independent Director)	No. of Independent Directors attending the meeting
08-Nov-2024	Yes	8	8	4
07-Feb-2025	Yes	8	7	4

Company Remarks	
Maximum gap between any two consecutive (in number of days)	90

G. Meeting of Committees

i. Meeting of Committees

Name of the Committee	Date(s) of meeting (Enter dates of Previous quarter and Current quarter in chronological order)	Whether requirement of Quorum met (Yes/No)	Total Number of Directors in the Committee as on date of the meeting	Number of Directors present (All directors including Independent Director)	Number of Independent directors attending the meeting	Number of Members attending the Meeting (Other than Board of Directors)
Audit Committee	08-Nov-2024	Yes	4	4	3	0
Audit Committee	07-Feb-2025	Yes	4	4	3	0
Risk Management Committee	08-Nov-2024	Yes	3	3	1	0
Risk Management Committee	07-Feb-2025	Yes	3	3	1	0
Corporate Social Responsibility	07-Feb-2025	Yes	3	3	2	0

Committee						
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Company Remarks	
Maximum gap between any two consecutive (in number of days) [Only for Audit Committee]	90

VI. Affirmations

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**
 - b. Nomination & remuneration committee - **Yes**
 - c. Stakeholders relationship committee - **Yes**
 - d. Risk management committee (applicable to the top 1000 listed entities) - **Yes**
3. 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**
4. 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**
5. a. This report and/or the report submitted in the previous quarter has been placed before Board of Directors. - **Yes**
 b. Any comments/observations/advice of Board of Directors may be mentioned here:

Name of signatory	:	Anil Kumar
Designation	:	Company Secretary & Compliance Officer

Details of Cyber security incidence

Whether as per Regulation 27(2)(ba) of SEBI (LODR) Regulations, 2015 there has been cyber security incidents or breaches or loss of data or documents during the quarter	false
Other details of cyber security incidence or breaches or loss of data event	
Number of cyber security incidence or breaches or loss of data event occurred during the quarter	

ANNEXURE II

Format to be submitted by listed entity at the end of the financial year (for the whole of financial year)

I. Disclosure on website in terms of Listing Regulations			
Particular	Compliance status (Yes/No/NA)	Company Remark	Website
As per regulation 46(2) of the LODR:			
Details of business	Yes		www.ace-cranes.com

Terms and conditions of appointment of independent directors	Yes		www.ace-cranes.com
Composition of various committees of board of directors	Yes		www.ace-cranes.com
Code of conduct of board of directors and senior management personnel	Yes		www.ace-cranes.com
Details of establishment of vigil mechanism/ Whistle Blower policy	Yes		www.ace-cranes.com
Criteria of making payments to non-executive directors	Yes		www.ace-cranes.com
Policy on dealing with related party transactions	Yes		www.ace-cranes.com
Policy for determining 'material' subsidiaries	Yes		www.ace-cranes.com
Details of familiarization programs imparted to independent directors	Yes		www.ace-cranes.com
Email address for grievance redressal and other relevant details entity who are responsible for assisting and handling investor grievances	Yes		www.ace-cranes.com
Contact information of the designated officials of the listed entity who	Yes		www.ace-cranes.com
Financial results	Yes		www.ace-cranes.com
Shareholding pattern	Yes		www.ace-cranes.com
Details of agreements entered into with the media companies and/or their associates	Not Applicable		
Schedule of analyst or institutional investor meet and presentations made by the listed entity to analysts or institutional investors simultaneously with submission to stock exchange.	Yes		www.ace-cranes.com
Audio or Video recordings and transcript of post earning/quarterly calls	Yes		www.ace-cranes.com
New name and the old name of the listed entity	Not Applicable		
Advertisements as per regulation 47 (1)	Yes		www.ace-cranes.com
Credit rating or revision in credit rating obtained	Yes		www.ace-cranes.com
Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year	Yes		www.ace-cranes.com
Secretarial Compliance Report	Yes		www.ace-cranes.com
Disclosure of contact details of KMP who are authorized for the purpose of determining materiality as required under regulation 30(5)	Yes		www.ace-cranes.com
Materiality Policy as per Regulation 30(4)	Yes		www.ace-cranes.com
Dividend Distribution policy as per Regulation 43A (as applicable)	Yes		www.ace-cranes.com
It is certified that these contents on the website of the listed entity are correct.	Yes		www.ace-cranes.com
Disclosure under regulation 30(8)	Yes		www.ace-cranes.com
Statement of deviation(s) or variation(s) as specified in regulation 32	Yes		www.ace-cranes.com
Annual Return as provided under section 92 of the Companies Act, 2013	Yes		www.ace-cranes.com
Confirmation that the above disclosure are in separate section as specified in regulation 46(2)	Yes		www.ace-cranes.com
Compliance with regulation 46(3) with respect to accuracy of disclosures on the website and timely updation	Yes		www.ace-cranes.com
II Annual Affirmations			
Particulars	Regulation Number	Compliance status	Company Remark

Independent director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility'	16(1)(b) & 25(6)	Yes	
Board composition	17(1), 17(1A) & 17(1C) 17(1D), 17(1E)	Yes	
Meeting of Board of directors	17(2)	Yes	
Quorum of Board meeting	17(2A)	Yes	
Review of Compliance Reports	17(3)	Yes	
Plans for orderly succession for appointments	17(4)	Yes	
Code of Conduct	17(5)	Yes	
Fees/compensation	17(6)	Yes	
Minimum Information	17(7)	Yes	
Compliance Certificate	17(8)	Yes	
Risk Assessment & Management	17(9)	Yes	
Performance Evaluation of Independent Directors	17(10)	Yes	
Recommendation of Board	17(11)	Yes	
Maximum number of directorship	17A	Yes	
Composition of Audit Committee	18(1)	Yes	
Meeting of Audit Committee	18(2)	Yes	
Role of Audit Committee and information to be reviewed by the audit Committee	18(3)	Yes	
Composition of nomination & remuneration committee	19(1) & (2)	Yes	
Quorum of Nomination and Remuneration Committee	19(2A)	Yes	
Meeting of nomination & remuneration committee	19(3A)	Yes	
Role of Nomination and Remuneration Committee	19(4)	Yes	
Composition of Stakeholder Relationship Committee	20(1), 20(2) and 20(2A)	Yes	
Meeting of Stakeholder Relationship Committee	20(3A)	Yes	
Role of Stakeholder Relationship Committee	20(4)	Yes	
Composition and role of risk management committee	21(1),(2),(3),(4)	Yes	
Meeting of Risk Management Committee	21(3A)	Yes	
Quorum of Risk Management Committee meeting	21(3B)	Yes	
Gap between the meeting of the Risk Management Committee	21(3C)	Yes	
Vigil Mechanism	22	Yes	
Policy for related party Transaction	23(1),(1A),(5),(6), (7) & (8)	Yes	
Prior or Omnibus approval of Audit Committee for all related party transactions	23(2), (3)	Yes	
Approval for material related party transactions	23(4)	Not	
Disclosure of related party transactions on consolidated basis	23(9)	Yes	
Composition of Board of Directors of unlisted material Subsidiary	24(1)	N/A	

Other Corporate Governance requirements with respect to subsidiary of listed entity	24(2),(3),(4),(5) & (6)	Yes	
Appointment, re-appointment or removal of an independent director through special resolution or the alternate mechanism	25(2A)	Yes	
Alternate Director to Independent Director	25(1)	Not	
Maximum Tenure	25(2)	Yes	
Meeting of independent directors	25(3) & (4)	Yes	
Familiarization of independent directors	25(7)	Yes	
Declaration from Independent Director	25(8) & (9)	Yes	
D & O Insurance for Independent insurance	25(10)	Yes	
Memberships in Committees	26(1)	Yes	
Affirmation with compliance to code of conduct from members of Board of Directors and Senior management personnel	26(3)	Yes	
Disclosure of Shareholding by Non- Executive Directors	26(4)	Yes	
Policy with respect to Obligations of directors and senior management	26(2) & 26(5)	Yes	
Confirmation with respect to appointment of Independent Directors who resigned from the listed entity	25(11)	Yes	
Memberships in Committees	26(1)	Yes	
Affirmation with compliance to code of conduct from members of Board of Directors and Senior management personnel	26(3)	Yes	
Disclosure of Shareholding by Non- Executive Directors	26(4)	Yes	
Approval of the Board and shareholders for compensation or profit sharing in connection with dealings in the securities of the listed entity	26(6)	Yes	Approval of the Board and shareholders for compensation or profit sharing in connection with dealings in the securities of the listed entity
Vacancies in respect Key Managerial Personnel	26A(1) & 26A(2)	Yes	Vacancies in respect Key Managerial Personnel

III Affirmations:

The Listed Entity has approved Material Subsidiary Policy and the Corporate Governance requirements with respect to subsidiary of Listed Entity have been complied. -NA

Other Information	
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Name of signatory : **ANIL KUMAR**
Designation of person : **Company Secretary & Compliance Officer**
Place : **Palwal**
Date : **25-04-2025**

Investor Grievance Details

No of Investor Complaints pending at the beginning of Quarter	0
No of Investor Complaints received during the Quarter	3
No of Investor Complaints disposed off during the Quarter	3
No of Investor Complaints those remaining unresolved at the end of the Quarter	0

ANNEXURE IV

Disclosure of updates to ongoing Tax Litigation or Dispute The updates on Tax Litigation or Dispute in terms of sub-para 8 of Para B of Part A of Schedule III read with corresponding provisions of Annexure-18 of Master Circular are Given below:-

Any Other Information for Disclosure of Updates to Ongoing Tax Litigations or Disputes				
Sr.No	Name of the opposing party	Date of initiation of the	Status of the litigation / dispute as per last disclosure	Current status of the litigation / dispute
1	DCIT CIRCLE FARIDABAD-1	05-09-2017	Case pending With Commissioner of Income Tax (Appeal)	Case pending With Commissioner of Income Tax (Appeal)
2	DCIT CIRCLE FARIDABAD-1	27-12-2018	Case pending With Commissioner of Income Tax (Appeal)	Case pending With Commissioner of Income Tax (Appeal)
3	DCIT CIRCLE FARIDABAD-1	16-11-2019	Case pending With Commissioner of Income Tax (Appeal)	Case pending With Commissioner of Income Tax (Appeal)
4	Commissioner of Excise Department	04-01-2011	Order by Mumbai larger bench has given in our favour, however final decision pending with CESTAT Chandigarh	Order by Mumbai larger bench has given in our favour, however final decision pending with CESTAT Chandigarh
5	Additional Commissioner of Excise Faridabad	20-04-2014	Case is Pending & Reserve in call book	Case is Pending & Reserve in call book

6	Commissioner of West Bengal Sales Tax	17-11-2011	Cases are pending at West Bengal Tribunal (2006-07 to 2013-14) (Multiple cases relating to VAT Dues)	Cases are pending at West Bengal Tribunal (2006-07 to 2013-14) (Multiple cases relating to VAT Dues)
7	Commissioner of West Bengal Sales Tax	22-09-2011	Cases are pending at Additional Commissioner Review Board (West Bengal) (2006-07 to 2013-14) (Multiple cases relating to VAT	Cases are pending at Additional Commissioner Review Board (West Bengal) (2006-07 to 2013-14) (Multiple cases relating to VAT Dues)
8	Commissioner of West Bengal Sales Tax	22-06-2015	Cases is pending at High Court West Bengal	Cases is pending at High Court West Bengal
9	Asst. Commissioner GST Jaipur	22-09-2023	Hearing Attended waiting for Order	Demand Confirmed by Joint Commissioner Appeal, we will file Appeal in GSTAT
10	Superintendent GST Range-XXX, Div F, Jaipur	31-07-2024	Waiting for Hearing	Waiting for Hearing
11	Assistant Commissioner Anti-Evasion, GST Faridabad	31-07-2024	Hearing Attended waiting for Order	Demand Confirmed by Assistant Commissioner Palwal, now we will file appeal to Joint Commissioner (Appeal) Gurugram
12	Superintendent - AE, GST Faridabad	23-07-2024	Hearing Attended waiting for Order	Demand Confirmed by Superintendent, now we will file appeal to Joint Commissioner (Appeal) Gurugram
13	Proper Officer Faridabad WEST, GST Faridabad	21-11-2024	Waiting for Hearing	Appeal Filled with Joint Commissioner (Appeal) Faridabad, Waiting for Hearing
14	Asst Commissioner Commercial Tax (Audit) Bangalore, Commercial Tax Department Karnataka	26-11-2024	Waiting for Hearing	Order for proceeding Dropped by Assistant commissioner in our favour, Case Closed.