

Form No. MGT-7

Form language

☒ English ☐ Hindi**Annual Return (other than OPCs and Small Companies)**

[Pursuant to sub-section (1) of section 92 of the Companies Act, 2013 and sub-rule (1) of rule 11 of the Companies (Management and Administration) Rules, 2014]



All fields marked in * are mandatory

Refer instruction kit for filing the form

I REGISTRATION AND OTHER DETAILS

i *Corporate Identity Number (CIN)

L74899HR1995PLC053860

ii (a) *Financial year for which the annual return is being filed (From date) (DD/MM/YYYY)

01/04/2024

(b) *Financial year for which the annual return is being filed (To date) (DD/MM/YYYY)

31/03/2025

(c) *Type of Annual filing

☒ Original

☐ Revised

(d) SRN of MGT-7 filed earlier for the same financial years

iii

Particulars	As on filing date	As on the financial year end date
Name of the company	ACTION CONSTRUCTION EQUIPMENT LIMITED	ACTION CONSTRUCTION EQUIPMENT LIMITED
Registered office address	Dudhola Link Road Dudhola,NA,Palwal,Faridabad,Haryana,India,121102	Dudhola Link Road Dudhola,NA,Palwal,Faridabad,Haryana,India,121102
Latitude details	28.2128623	28.2128623
Longitude details	77.2737268	77.2737268

(a) *Photograph of the registered office of the Company showing external building and name prominently visible

Photo ACE.jpg

(b) *Permanent Account Number (PAN) of the company

AA*****9P

(c) *e-mail ID of the company

*****e-cranes.com

(d) *Telephone number with STD code

91*****03

(e) Website www.ace-cranes.com

iv *Date of Incorporation (DD/MM/YYYY) 13/01/1995

v (a) *Class of Company (as on the financial year end date)
(Private company/Public Company/One Person Company) Public company

(b) *Category of the Company (as on the financial year end date)
(Company limited by shares/Company limited by guarantee/Unlimited company) Company limited by shares

(c) *Sub-category of the Company (as on the financial year end date)
(Indian Non-Government company/Union Government Company/State Government Company/
Guarantee and association company/Subsidiary of Foreign Company) Indian Non-Government company

vi *Whether company is having share capital (as on the financial year end date) ☒ Yes ☐ No

vii (a) Whether shares listed on recognized Stock Exchange(s) ☒ Yes ☐ No

(b) Details of stock exchanges where shares are listed

S. No.	Stock Exchange Name	Code
1	Bombay Stock Exchange (BSE)	A1 - Bombay Stock Exchange (BSE)
2	National Stock Exchange (NSE)	A1024 - National Stock Exchange (NSE)

viii Number of Registrar and Transfer Agent

1

CIN of the Registrar and Transfer Agent	Name of the Registrar and Transfer Agent	Registered office address of the Registrar and Transfer Agents	SEBI registration number of Registrar and Transfer Agent
U74899DL1995PTC071324	SKYLINE FINANCIAL SERVICES PRIVATE LIMITED	D-153A, FIRST FLOOR OKHLA INDUSTRIAL AREA, PHASE-I, NEW DELHI, New Delhi, Delhi, India, 110020	INR000003241

ix * (a) Whether Annual General Meeting (AGM) held ☒ Yes ☐ No

(b) If yes, date of AGM (DD/MM/YYYY) 29/08/2025

(c) Due date of AGM (DD/MM/YYYY) 30/09/2025

(d) Whether any extension for AGM granted ☐ Yes ☒ No

(e) If yes, provide the Service Request Number (SRN) of the GNL-1 application form filed for extension

(f) Extended due date of AGM after grant of extension (DD/MM/YYYY)

(g) Specify the reasons for not holding the same

II PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

i *Number of business activities

1

S. No.	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the company
1	C	Manufacturing	28	Manufacture of machinery and equipment n.e.c.	100

III PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

i *No. of Companies for which information is to be given

5

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Jo int Venture	% of shares held
1	U29309HR2021PTC096749		CRANE KRAFT INDIA PRIVATE LIMITED	Subsidiary	100
2		FCRN RO2816464	SC Forma SA	Subsidiary	89.52
3		AAGFN70Z1E	Namo Metals	Subsidiary	90
4		AADTA4988L	ACE Emergency response service trust (trust)	Subsidiary	100
5		AAKTA0428Q	Action Construction Equipment Limited Employees welfare trust (trust)	Subsidiary	100

IV SHARE CAPITAL, DEBENTURES AND OTHER SECURITIES OF THE COMPANY**I SHARE CAPITAL****(a) Equity share capital**

Particulars	Authorised Capital	Issued capital	Subscribed capital	Paid Up capital
Total number of equity shares	276250000.00	119083196.00	119083196.00	119083196.00
Total amount of equity shares (in rupees)	552500000.00	238166392.00	238166392.00	238166392.00

Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
EQUITY SHARES				
Number of equity shares	276250000	119083196	119083196	119083196
Nominal value per share (in rupees)	2	2	2	2
Total amount of equity shares (in rupees)	552500000.00	238166392.00	238166392	238166392

(b) Preference share capital

Particulars	Authorised Capital	Issued capital	Subscribed capital	Paid Up capital
Total number of preference shares	0.00	0.00	0.00	0.00
Total amount of preference shares (in rupees)	0.00	0.00	0.00	0.00

Number of classes

0

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital

Number of preference shares				
Nominal value per share (in rupees)				
Total amount of preference shares (in rupees)				

(c) Unclassified share capital

Particulars	Authorised Capital
Total amount of unclassified shares	0

(d) Break-up of paid-up share capital

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
	Physical	DEMAT	Total			
(i) Equity shares						
At the beginning of the year	13677	119069519	119083196.00	238166392	238166392	
Increase during the year	1.00	5006.00	5007.00	10010.00	10010.00	0.00
i Public Issues	0	0	0.00	0	0	
ii Rights issue	0	0	0.00	0	0	
iii Bonus issue	0	0	0.00	0	0	
iv Private Placement/ Preferential allotment	0	0	0.00	0	0	
v ESOPs	0	0	0.00	0	0	
vi Sweat equity shares allotted	0	0	0.00	0	0	
vii Conversion of Preference share	0	0	0.00	0	0	
viii Conversion of Debentures	0	0	0.00	0	0	
ix GDRs/ADRs	0	0	0.00	0	0	
x Others, specify <div>PHYSICAL SHARES CONVERTED INTO DEMAT & 1 SHARE FROM DEMAT TO REMAT</div>	1	5006	5007.00	10010	10010	0
Decrease during the year	5006.00	1.00	5007.00	10010.00	10010.00	0
i Buy-back of shares	0	0	0.00	0	0	

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	
iv Others, specify <div>PHYSICAL SHARES CONVERTED INTO DEMAT & 1 SHARE FROM DEMAT TO REMAT</div>	5006	1	5007.00	10010	10010	
At the end of the year	8672.00	119074524.00	119083196.00	238166392.00	238166392.00	
(ii) Preference shares						
At the beginning of the year	0	0	0.00	0	0	
Increase during the year	0.00	0.00	0.00	0.00	0.00	0
i Issues of shares	0	0	0.00	0	0	
ii Re-issue of forfeited shares	0	0	0.00	0	0	
iii Others, specify <div>NA</div>	0	0	0.00	0	0	
Decrease during the year	0.00	0.00	0.00	0.00	0.00	0
i Redemption of shares	0	0	0.00	0	0	
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	
iv Others, specify <div>NA</div>	0	0	0.00	0	0	
At the end of the year	0.00	0.00	0.00	0.00	0.00	

ISIN of the equity shares of the company

INE731H01025

ii Details of stock split/consolidation during the year (for each class of shares)

0

Class of shares		
Before split / Consolidation		
	Number of shares	
	Face value per share	
After split / consolidation		
	Number of shares	
	Face value per share	

iii Details of shares/Debentures Transfers since closure date of last financial year (or in the case of the first return at any time since the incorporation of the company)

☒ Nil

Number of transfers

Attachments:

1. Details of shares/Debentures Transfers

iv Debentures (Outstanding as at the end of financial year)

(a) Non-convertible debentures

*Number of classes

0

Classes of non-convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of non-convertible debentures	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Total				

(b) Partly convertible debentures

*Number of classes

0

Classes of partly convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of partly convertible debentures	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Total				

(c) Fully convertible debentures

*Number of classes

0

Classes of fully convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of fully convertible debentures	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Total				

(d) Summary of Indebtedness

Particulars	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Non-convertible debentures	0.00	0.00	0.00	0.00
Partly convertible debentures	0.00	0.00	0.00	0.00

Fully convertible debentures	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00

v Securities (other than shares and debentures)

0

Type of Securities	Number of Securities	Nominal Value of each Unit	Total Nominal Value	Paid up Value of each Unit	Total Paid up Value
Total					

V Turnover and net worth of the company (as defined in the Companies Act, 2013)

i *Turnover

33203175815

ii * Net worth of the Company

15973112727

VI SHARE HOLDING PATTERN

A Promoters

S. No	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family				
	(i) Indian	77897463	65.41	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00
	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00

	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	0	0.00	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	0	0.00	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	0	0.00	0	0.00
10	Others <div></div>	0	0.00	0	0.00
	Total	77897463.00	65.41	0.00	0

Total number of shareholders (promoters)

5

B Public/Other than promoters

S. No	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family				
	(i) Indian	21645279	18.18	0	0.00
	(ii) Non-resident Indian (NRI)	2226918	1.87	0	0.00
	(iii) Foreign national (other than NRI)	2600	0.00	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00

	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	836807	0.70	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	13784351	11.58	0	0.00
7	Mutual funds	524271	0.44	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	800079	0.67	0	0.00
10	Others	1365428	1.15	0	0.00
	AIF IEPF NBFC TRUST				
	Total	41185733.00	34.59	0.00	0

Total number of shareholders (other than promoters)

166868

Total number of shareholders (Promoters + Public/Other than promoters)

166873.00

Breakup of total number of shareholders (Promoters + Other than promoters)

Sl.No	Category	
1	Individual - Female	44793
2	Individual - Male	121245
3	Individual - Transgender	0
4	Other than individuals	835
	Total	166873.00

C Details of Foreign institutional investors' (FIIs) holding shares of the company

163

Name of the FII	Address	Date of Incorporation	Country of Incorporation	Number of shares held	% of shares held
-----------------	---------	-----------------------	--------------------------	-----------------------	------------------

MASSACHUSETTS INSTITUTE OF TECHNOLOGY	77 MASSACHUSETTS AVENUE CAMBRIDGE MA UNITED STATES OF AMERICA	01/04/2025	United States	2707745	2.27
POLAR CAPITAL FUNDS PLC - EMERGING MARKET STARS FUND	#N/A	01/04/2025	Ireland	2399913	2.01
238 PLAN ASSOCIATES LLC	ONE BROADWAY 9TH FLOOR SUITE 200 CAMBRIDGE MA	01/04/2025	United Kingdom	658750	0.55
VANGUARD TOTAL INTERNATIONAL STOCK INDEX FUND	100 VANGUARD BOULEVARD MALVERN PA UNITED STATES OF AMERICA	01/04/2025	United States	562001	0.47
VANGUARD EMERGING MARKETS STOCK INDEX FUND, A SERIES OF VANGUARD INTERNATIONAL EQUITY INDEX FUNDS	100 VANGUARD BOULEVARD MALVERN PA UNITED STATES OF AMERICA	01/04/2025	United States	499998	0.41
ISHARES CORE MSCI EMERGING MARKETS ETF	400 HOWARD STREET SAN FRANCISCO CA 94105	01/04/2025	United States	469655	0.39
WASATCH EMERGING INDIA FUND	505 WAKARA WAY 3RD FLOOR SALT LAKE CITY UTAH	01/04/2025	United States	442280	0.37
MATTHEWS EMERGING MARKETS SMALL COMPANIES FUND	FOUR EMBARCADERO CENTER SUITE 550 SAN FRANCISCO CA UNITED STATES OF AMERICA	01/04/2025	United States	422653	0.35
EMERGING MARKETS CORE EQUITY PORTFOLIO (THE PORTFOLIO) OF DFA INVESTMENT DIMENSIONS GROUP INC. (DFAIDG)	6300 Bee Cave Road Building One Austin Texas 78746 USA UNITED STATES OF AMERICA	01/04/2025	United States	341269	0.28
GOVERNMENT PENSION FUND GLOBAL	Bankplassen 2 P O Box 1179 Sentrum Oslo 0107 NORWAY	01/04/2025	Norway	319360	0.26
POLAR CAPITAL FUNDS PLC - ASIAN STARS FUND	#N/A	01/04/2025	Ireland	294755	0.24

VANGUARD FIDUCIARY TRUST COMPANY INSTITUTIONAL TOTAL INTERNATIONAL STOCK MARKET INDEX TRUST II	100 VANGUARD BOULEVARD MALVERN PENNSYLVANIA	01/04/2025	United States	290891	0.24
TEACHERS RETIREMENT SYSTEM OF THE STATE OF ILLINOIS - WASATCH ADVISORS	2815 WEST WASHINGTON STREET SPRINGFIELD ILLINOIS UNITED STATES OF AMERICA	01/04/2025	United States	228732	0.19
LOS ANGELES CITY EMPLOYEES RETIREMENT SYSTEM	202 West First Street Suite 500 Los Angeles California UNITED STATES OF AMERICA	01/04/2025	United States	220148	0.18
WASATCH EMERGING MARKETS SMALL CAP FUND	505 WAKARA WAY 3RD FLOOR SALT LAKE CITY UTAH	01/04/2025	United States	196617	0.16
ABU DHABI INVESTMENT AUTHORITY - MONSOON	211 CORNICHE STREET PO BOX 3600 ABU DHABI UNITED ARAB EMIRATES	01/04/2025	United Arab Emirates	196137	0.16
EMERGING MARKETS SMALL CAPITALIZATION EQUITY INDEX NON-LENDABLE FUND	400 HOWARD STREET SAN FRANCISCO CA 94105 UNITED STATES OF AMERICA	01/04/2025	United States	169767	0.14
PUBLIC EMPLOYEES RETIREMENT SYSTEM OF OHIO	277 EAST TOWN STREET COLUMBUS OH 43215 USA UNITED STATES OF AMERICA	01/04/2025	United States	162871	0.13
COMMONWEALTH OF PENNSYLVANIA PUBLIC SCHOOL EMPLOYEES RETIREMENT SYSTEM/GE322-WASATCH ADVISORS INC	5 NORTH FIFTH STREET HARRISBURG PA UNITED STATES OF AMERICA	01/04/2025	United States	154079	0.12
ISHARES CORE MSCI EM IMI UCITS ETF ISHARES CORE MSCI EM IMI	JP MORGAN 200 CAPITAL DOCK 79 SIR JOHN ROGERSONS QUAY DUBLIN IRELAND	01/04/2025	Ireland	144951	0.12
ALL-WORLD EX-US SMALL-CAP INDEX FUND	100 VANGUARD BOULEVARD MALVERN PA UNITED STATES OF AMERICA	01/04/2025	United States	134451	0.11

PENSION RESERVES INVESTMENT TRUST FUND - WASTACH	CO/ PRIM BOARD SUITE 600 53 STATE STREET BOSTON MASSACHUSETTS UNITED STATES OF AMERICA	01/04/2025	United States	127047	0.1
POLAR CAPITAL EMERGING MARKET STARS FUND	50 South La Salle St Chicago Illinois	01/04/2025	United States	119291	0.1
GOVERNMENT OF SINGAPORE - E	168 Robinson Road 37 01 Capital Tower NA SINGAPORE	01/04/2025	Singapore	109898	0.09
STATE STREET GLOBAL SMALL CAP EQUITY EXU. S. INDEX NONLENDING SERIES FUND	ONE IRON STREET BOSTON MA UNITED STATES OF AMERICA	01/04/2025	United States	107177	0.09

VII NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS

[Details of Promoters, Members (other than promoters), Debenture holders]

Details	At the beginning of the year	At the end of the year
Promoters	5	5
Members (other than promoters)	131251	166868
Debenture holders	0	0

VIII DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A Composition of Board of Directors

Category	Number of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A Promoter	4	0	4	0	65.37	0
B Non-Promoter	0	4	0	4	0.00	0.02
i Non-Independent	0	0	0	0	0	0
ii Independent	0	4	0	4	0	0.02

C Nominee Directors representing	0	0	0	0	0.00	0.00
i. Banks and FIs	0	0	0	0	0	0
ii Investing institutions	0	0	0	0	0	0
iii Government	0	0	0	0	0	0
iv Small share holders	0	0	0	0	0	0
v Others	0	0	0	0	0	0
Total	4	4	4	4	65.37	0.02

*Number of Directors and Key managerial personnel (who is not director) as on the financial year end date

10

B (i) Details of directors and Key managerial personnel as on the closure of financial year

Name	DIN/PAN	Designation	Number of equity shares held	Date of cessation (after closure of financial year : If any) (DD/MM/YYYY)
VIJAY AGARWAL	00057634	Managing Director	34236078	
MONA AGARWAL	00057653	Whole-time director	29357579	
SORAB AGARWAL	00057666	Whole-time director	7323650	
SURBHI GARG	01558782	Whole-time director	6930156	
AVINASH PARKASH GANDHI	00161107	Director	0	
DIVYA SINGAL	08722144	Director	27400	
SHRINIWAS VASHISHT	06572418	Director	0	
JAGAN NATH CHAMBER	08841478	Director	0	
RAJAN LUTHRA	AABPL2465R	CFO	1765	
ANIL KUMAR	BMPPK7505J	Company Secretary	0	

B (ii) *Particulars of change in director(s) and Key managerial personnel during the year

0

Name	DIN/PAN	Designation at the beginning / during the financial year	Date of appointment/ change in designation/ cessation (DD/MM/YYYY)	Nature of change (Appointment/ Change in designation/ Cessation)

IX MEETINGS OF MEMBERS/CLASS OF MEMBERS/ BOARD/COMMITTEES OF THE BOARD OF DIRECTORS

A MEMBERS/CLASS /REQUISITIONED/NCLT/COURT CONVENED MEETINGS

*Number of meetings held

1

Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Annual general meeting	27/08/2024	187411	89	65.45

B BOARD MEETINGS

*Number of meetings held

4

S.No	Date of meeting (DD/MM/YYYY)	Total Number of directors as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	21/05/2024	8	8	100
2	31/07/2024	8	8	100
3	08/11/2024	8	8	100
4	07/02/2025	8	7	87.5

C COMMITTEE MEETINGS

Number of meetings held

12

S.No	Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members as on the date of meeting	Attendance	
				Number of members attended	% of attendance
1	Audit Committee	08/11/2024	4	4	100
2	Audit Committee	07/02/2025	4	4	100
3	Corporate Social responsibility Committee	21/05/2024	3	3	100
4	Corporate Social responsibility Committee	07/02/2025	3	3	100
5	Committee of Board of Directors	02/09/2024	3	3	100
6	Committee of Board of Directors	02/01/2025	3	3	100
7	Audit Committee	31/07/2024	4	4	100
8	Stakeholder Relationship Committee	21/05/2024	3	3	100
9	Risk Management Committee	08/11/2024	3	3	100
10	Risk Management Committee	07/02/2025	3	3	100
11	Nomination & Remuneration Committee	21/05/2024	3	3	100
12	Audit Committee	21/05/2024	4	4	100

D ATTENDANCE OF DIRECTORS

S. N o	Name of the Director	Board Meetings			Committee Meetings			Whether attended AGM held on
		Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attenda nce	Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attend ance	
								29/08/2025 (Y/N/NA)
1	VIJAY AGARWAL	4	4	100	8	8	100	Yes
2	MONA AGARWAL	4	4	100	4	4	100	Yes

3	SORAB AGARWAL	4	4	100	5	5	100	No
4	SURBHI GARG	4	3	75	0	0	0	Yes
5	AVINASH PARKASH GANDHI	4	4	100	6	6	100	No
6	DIVYA SINGAL	4	4	100	6	6	100	Yes
7	SHRINIWAS VASHISHT	4	4	100	5	5	100	Yes
8	JAGAN NATH CHAMBER	4	4	100	6	6	100	Yes

X REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

☐ Nil

A *Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered

4

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Mr. Vijay Agarwal	Managing Director	45000000	0	0	10874943	55874943.00
2	Mrs. Mona Agarwal	Whole-time director	22500000	0	0	7718522	30218522.00
3	Mr. Sorab Agarwal	Whole-time director	12240000	0	0	741841	12981841.00
4	Mrs. Surbhi Garg	Whole-time director	9720000	0	0	578322	10298322.00
	Total		89460000.00	0.00	0.00	19913628.00	109373628.00

B *Number of CEO, CFO and Company secretary whose remuneration details to be entered

2

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Mr. Rajan Luthra	CFO	5524344	0	1894374	39600	7458318.00
2	Mr. Anil Kumar	Company Secretary	1125112	0	0	3234	1128346.00
	Total		6649456.00	0.00	1894374.00	42834.00	8586664.00

C *Number of other directors whose remuneration details to be entered

4

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Avinash Prakash Gandhi	Director	335000	0	0	0	335000.00
2	Divya Singal	Director	315000	0	0	0	315000.00
3	Shriniwas Vashisht	Director	320000	0	0	0	320000.00
4	Jagan Nath Chamber	Director	345000	0	0	0	345000.00
	Total		1315000.00	0.00	0.00	0.00	1315000.00

XI MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

A *Whether the company has made compliances and disclosures in respect of applicable provisions of the Companies Act, 2013 during the year ☒ Yes ☐ No

B If No, give reasons/observations

XII PENALTY AND PUNISHMENT – DETAILS THEREOF

A *DETAILS OF PENALTIES / PUNISHMENT IMPOSED ON COMPANY/ DIRECTORS/OFFICERS ☒ Nil

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order (DD/MM/YYYY)	Name of the Act and section under which penalised / punished	Details of penalty/ punishment	Details of appeal (if any) including present status

B *DETAILS OF COMPOUNDING OF OFFENCES ☒ Nil

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order (DD/MM/YYYY)	Name of the Act and section under which offence committed	Particulars of offence	Amount of compounding (in rupees)

XIII Details of Shareholder / Debenture holder

Number of shareholder/ debenture holder

166873

XIV Attachments

(a) List of share holders, debenture holders

Details of Shareholder or
Debenture holder ACE.xlsm

(b) Optional Attachment(s), if any

Note.pdf
Final 144- Foreign_Institutional
Investors_31032025-
144(Final).pdf
MGT-8_ACE_FY24-25.pdf**XV COMPLIANCE OF SUB-SECTION (2) OF SECTION 92, IN CASE OF LISTED COMPANIES**

In case of a listed company or a company having paid up share capital of Ten Crore rupees or more or turnover of Fifty Crore rupees or more, details of company secretary in whole time practice certifying the annual return in Form MGT-8.

I/We certify that:

- (a) The return states the facts, as they stood on the date of the closure of the financial year aforesaid correctly and adequately.
- (b) Unless otherwise expressly stated to the contrary elsewhere in this return, the Company has complied with applicable provisions of the Act during the financial year.
- (c) The company has not, since the date of the closure of the last financial year with reference to which the last return was submitted or in the case of a first return since the date of incorporation of the company, issued any invitation to the public to subscribe for any securities of the company.
- (d) Where the annual return discloses the fact that the number of members, (except in case of one person company), of the company exceeds two hundred, the excess consists wholly of persons who under second proviso to clause (ii) of sub-section (68) of section 2 of the Act are not to be included in reckoning the number of two hundred.

I/ We have examined the registers, records and books and papers of

ACTION CONSTRUCTION
EQUIPMENT LIMITED

as required to be

maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the financial year ended on

(DD/MM/YYYY) 31/03/2025

In my/ our opinion and to the best of my information and according to the examinations carried out by me/ us and explanations furnished to me/ us by the company, its officers and agents, I/ we certify that:

A The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.

B During the aforesaid financial year the Company has complied with provisions of the Act & Rules made there under in respect of:

- 1 its status under the Act;
- 2 maintenance of registers/records & making entries therein within the time prescribed therefor;
- 3 filing of forms and returns as stated in the annual return, with the Registrar of Companies, Regional Director, Central Government, the Tribunal, Court or other authorities within/beyond the prescribed time;
- 4 calling/ convening/ holding meetings of Board of Directors or its committees, if any, and the meetings of the members of the company on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings

including the circular resolutions and resolutions passed by postal ballot, if any, have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed;

5 closure of Register of Members / Security holders, as the case may be.

6 advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act;

7 contracts/arrangements with related parties as specified in section 188 of the Act;

8 issue or allotment or transfer or transmission or buy back of securities/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances;

9 keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act

10 declaration/ payment of dividend; transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;

11 signing of audited financial statement as per the provisions of section 134 of the Act and report of directors is as per sub - sections (3), (4) and (5) thereof;

12 constitution/ appointment/ re-appointments/ retirement/ filling up casual vacancies/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them;

13 appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;

14 approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;

15 acceptance/ renewal/ repayment of deposits;

16 borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable;

17 loans and investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Act ;

18 alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

To be digitally signed by

Name

CS Shobhit Vasisht

Date (DD/MM/YYYY)

18/11/2025

Place

Faridabad

Whether associate or fellow:

☐ Associate ☒ Fellow

Certificate of practice number

2*4*6

XVI Declaration under Rule 9(4) of the Companies (Management and Administration) Rules, 2014

*(a) DIN/PAN/Membership number of Designated Person

BMPPK7505J

*(b) Name of the Designated Person

ANIL KUMAR

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* dated*
(DD/MM/YYYY) to sign this form and declare that all the requirements of Companies Act, 2013

and the rules made thereunder in respect of the subject matter of this form and matters incidental thereto have been complied with. I further declare that:

- 1 Whatever is stated in this form and in the attachments thereto is true, correct and complete and no information material to the subject matter of this form has been suppressed or concealed and is as per the original records maintained by the company.
- 2 All the required attachments have been completely and legibly attached to this form.

***To be digitally signed by**

***Designation**

(Director /Liquidator/ Interim Resolution Professional (IRP)/Resolution Professional (RP))

***DIN of the Director; or PAN of the Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator**

***To be digitally signed by**

☒ Company Secretary ☐ Company secretary in practice

***Whether associate or fellow:**

☒ Associate ☐ Fellow

Membership number

Certificate of practice number

Note: Attention is drawn to provisions of Section 448 and 449 of the Companies Act, 2013 which provide for punishment for false statement / certificate and punishment for false evidence respectively.

For office use only:

eForm Service request number (SRN)

eForm filing date (DD/MM/YYYY)

This eForm has been taken on file maintained by the Registrar of Companies through electronic mode and on the basis of statement of correctness given by the company