

To,
The Board of Directors,

Action Construction Equipment Limited
Dudhola Link Road, Dudhola, Distt.
Palwal-121102, Haryana, India

Dear Sir(s),

I, have examined the Register of Members and other details furnished by **Action Construction Equipment Limited** (hereinafter referred to as "the Company") and its Registrar and Transfer Agents, Skyline Financial Services Private Limited, for issuing this certificate in accordance with Circular No. D&CC/ FITTC/ CIR-16/2002 dated December 31, 2002, and further Circular no. CIR/MRD/DP/30/2010 dated September 06, 2010 and as per Regulation 76 of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 w.r.t 'Reconciliation of Share Capital Audit' issued by the Securities Exchange Board of India.

In my opinion and to the best of my knowledge and according to information and explanations given to me and based on such verifications as i considered necessary, I hereby certify that:

| 1. | For quarter ended | 31.12.2023 | | |
|----|--|--|--|--|
| 2. | ISIN No. | INE731H01025 | | |
| 3. | Face value | Rs. 2.00 | | |
| 4. | Name of the Company | Action Construction Equipment Limited | | |
| 5. | Registered office address | Dudhola Link Road, Dudhola, Distt. Palwal-121102, Haryana,India | | |
| 6. | Correspondence address | Registered & Corporate Office: Dudhola Link Road, Dudhola, Distt. Palwal, Haryana-121102. | | |
| 7. | Telephone | 01275-280103 | | |
| 8. | E-Mail address | cs@ace-cranes.com | | |
| 9. | Names of stock exchanges where the Company's securities are listed | (i) BSE Limited (ii) National Stock Exchange of India Limited. | | |

Regd Office: 441, Sector-2, Faridabad-121004, Haryana Email: cs@vasishtassociates.com ,www.vasishtassociates.com Contact No: +91-9953259389, +91-7838940145



| 10. | Issued capital | | |
|-----|-------------------------------|--------------|--------|
| | Equity Shares of Rs. 2/- each | 11,90,83,196 | 100.00 |
| | TOTAL | 11,90,83,196 | 100.00 |

| 16. | Reasons for difference, if any, between (10&11), (10&15) and (11&15) | NIL | |
|-----|---|--------------|--------|
| 15. | Total number of shares (12+13+14) | 11,90,83,196 | 100.00 |
| 14. | Physical | 13,677 | 0.01 |
| 13. | Held in dematerialized form in NSDL | 10,25,64,507 | 86.13 |
| 12. | Held in dematerialized form in CDSL | 1,65,05,012 | 13.86 |
| 11. | Listed Capital (as per Company's records) • Equity Shares of Rs.2/- each | 11,90,83,196 | 100.00 |

17. Certifying the details of change in share capital during the quarter under consideration as per table below:

| Particulars | No. of shares | Applied/ Not Applied forlisting | Listed onStock Exchanges (Specify names) | Whether intimate to CDSL | Whether intimate dto NSDL | In-prin. Appr. Pending for SE(Specify names) |
|-------------|---------------|--|---|--------------------------|---------------------------|--|
| NA | NA | NA | NA | NA | NA | NA |

| 18. | Register of members is updated (Yes/ No) | Yes | |
|-----|--|----------------|--|
| 19. | Reference of previous quarter with regard excess dematerialization, if any | Nil | |
| 20. | Has the Company resolved the matter mentioned in point no.19 above in the current quarter? If not, reason why? | Not Applicable | |



21. Mentioned the total no. of requests, if any, confirmed after 21 days and the total no. ofrequests pending beyond 21 days with the reasons for delay:

| Total No. requests | of | demat | No. of requests | No. of shares | Reasons for delay |
|--------------------|----|-------|-----------------|---------------|-------------------|
| | | | | NIL | |

| 22. | Name, telephone & fax no. of the Compliance Officer of the Company | Mr. Anil Kumar Action Construction Equipment Limited Dudhola Link Road, Dudhola, Distt. Palwal-121102, Haryana, India Ph.No: 01275-280103 Email: cs@ace-cranes.com |
|-----|---|--|
| 23. | Name, address, tel. & fax No./Regn.No. of the Certifying CA/ CS | Mr. Shobhit Vasisht (Practicing Company Secretary) FCS: 11517 C P No: 21476 PR: 2355/2022 Regd Office: 441, Sector-2, Faridabad-121004, Haryana, India Mob No: 9953259389 Email: cs@vasishtassociates.com |
| 24. | Appointment of common agency for share registry work. If yes, name and address | Yes Skyline Financial Services Private Limited Regd Office: D-153A, 1st Floor, Okhla Industrial Area, Phase-I New Delhi-110020,India Ph. No: 011-26812682 Email: admin@skylinerta.com Website: www.skylinerta.com SEBI Registration No. INR000003241 |



| | Any other detail that the | | |
|-----|-------------------------------|-----|--|
| 25. | auditor may like to provide | NIL | |
| | (e.g. BIFR company, delisting | | |
| | from SE, Company Changed its | | |
| | name etc.) | | |

Place: Faridabad Date: January 08, 2024 C.P No: 21476
PCS: 11517

Reserved

FOR VASISHT & ASSOCIATES (Company Secretaries)

CS SHOBHIT VASISHT

Proprietor

PR No: 2355/2022 **UDIN**: F011517E003148211

FCS No: 11517 C.P No:21476