

CIN: L45309DL2017PLC323467

DEEPAK BUILDERS & ENGINEERS INDIA LIMITED

Ref. No. : .....

Date : .....

Date: 27th May, 2025

To The Manager Listing Department National Stock Exchange of India Limited Exchange Plaza, C-1, Block G Bandra -Kurla Complex, Bandra (East) Mumbai – 400 051 Trading Symbol: DBEIL

The Manager Listing Department BSE Limited Phiroze Jeejeebhoy Tower Dalal Street, Mumbai - 400001 Script code: 544276

# Sub: Annual Secretarial Compliance Report for the financial year ended 31 March 2025

Dear Sir/Madam

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended 31 March 2025 duly issued by Lal Ghai & Associates, Company Secretaries.

Kindly take the above information on your record.

Thanking You,

Yours faithfully, For Deepak Builders & Engineers India Limited

Anil

Kumar

(Anil Kumar)

Digitally signed by Anil Kumar Date: 2025.05.27 15:34:36 +05'30'

Company Secretary & Compliance Officer

## SECRETARIAL COMPLIANCE REPORT OF DEEPAK BUILDERS & ENGINEERS INDIA LIMITED FOR THE FINANCIAL YEAR ENDED 31<sup>57</sup> MARCH, 2025

(Pursuant to Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **DEEPAK BUILDERS & ENGINEERS INDIA LIMITED** (hereinafter referred as 'the listed entity'), having its Registered Office at Ahluwalia Chambers, 1st Floor, Plot No. 16 & 17, Local Shopping Centre, Madangir, Near Pushpa Bhawan, New Delhi- 110062, Pushpa Bhawan, South Delhi, New Delhi, Delhi, India, 110062. 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 in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2025, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, Lal Ghai & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **DEEPAK BUILDERS & ENGINEERS INDIA LIMITED** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this report, for the year ended 31<sup>st</sup> March, 2025 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");

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;

LDH: 426 MIG Flats, Phase 3, Dugri, Near Army Apartments, Ludhiana – 141013 (Punjab) Tele: 0161-4610886, 9888406780, 9463640466 Email: csnikhilkalra@gmail.com, cssumitghai@gmail.com

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- (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;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; Not applicable during review period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; *(Not applicable during review period);*
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable during review period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable during review period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depository Participant) Regulations, 2018;
- (j) SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.
- (k) Circulars/ Guidelines issued thereunder;

Based on the above examinations, we hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Complianc e 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).	Yes	None
2.	<ul> <li>Adoption and timely updation of the Policies:</li> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	None

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3.	<ul> <li>Maintenance and disclosures on Website:</li> <li>The Listed entity is maintaining a functional website</li> <li>Timely dissemination of the documents/ information under a separate section on the website</li> <li>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</li> </ul>	Yes	None
4.	<b>Disqualification of Director:</b> None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None
5.	<ul> <li>Details related to Subsidiaries of listed entities</li> <li>have been examined w.r.t.:</li> <li>(a) Identification of material subsidiary companies</li> <li>(b) Disclosure requirement of material as well as other subsidiaries</li> </ul>	Yes	, None
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.	<b>Performance Evaluation:</b> 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.	<ul> <li>Related Party Transactions:</li> <li>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</li> <li>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently</li> </ul>	Yes	During the FY 2024 25, the listed company has obtained prior approval of Audit Committee for all
	approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	NA	Committee for all related party transaction Ludhianay

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9.	DEEPAK BUILDERS & ENGINEERS INDI 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 action(s) has been 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 except as provided underseparate paragraph herein.	Yes	None
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBIregulation/circular/guidance note etc.	Yes	None

We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations.- (Not Applicable)

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*	
1.	Compliances with the following conditions while appointing/re-appointing an auditor			
	i) If an auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	No event has been occurred for resignation of Auditor during the reporting period.	
	ii) If the auditor has resigned after 45 days from the end of a quarter of a financial	NA	mai & Asso	

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	year, the auditor before such resignation,		
	has issued the limited review/ audit report		
	for such quarter as well as the next		
	quarter; or		
	iii) If the auditor has signed the limited		
	review/ audit report for the first three		
	quarters of a financial year, the auditor	NA	
	before such resignation, has issued the	14/4	
	limited review/ audit report for the last		
	quarter of such financial year as well as		
	the audit report for such financial year.		
2.	Other conditions relating to resignation of	statutory auditor	
	A. Reporting of concerns by Auditor with	NA	
	respect to the listed entity/its material		
	subsidiary to the Audit Committee:		
	a. In case of any concern with the	NA	
	management of the listed entity/material	C	
	subsidiary such as non-availability of		
	information / non-cooperation by the		
	management which has hampered the		
	audit process, the auditor has		
	approached the Chairman of the Audit		
			•
	Committee of the listed entity and the		*
	Audit Committee shall receive such		
	concern directly and immediately		
	without specifically waiting for the		
	quarterly Audit Committee meetings.		
	b. In case the auditor proposes to resign,		
	all concerns with respect to the		
	proposed resignation, along with		
	relevant documents has been brought to	NA	
	the notice of the Audit Committee. In		
	cases where the proposed resignation is		
	due to non-receipt of information /		
	explanation from the company, the		
	auditor has informed the Audit		•
	Committee the details of information /		
	explanation sought and not provided by		& Associa
	the management, as applicable.		Sta Associates
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	<ul> <li>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</li> <li>ii. Disclaimer in case of non-receipt of information:</li> </ul>		
	The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	NA	
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	NA	

The Additional disclosures of Annual Secretarial Compliance Report as below:-

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder,
- (b) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable

#### Assumptions & Limitation of scope and Review:

- a. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
- b. Our responsibility is to certify based upon our examination of relevant documents and information.

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- c. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
- d. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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 Lal Ghai & Associates Company Secretaries × Ludhia any Nikhil Kalra

FCS No. 9498 CP No. 20800 UDIN: F009498G000449223

Place: Ludhiana Date: 27.05.2025