



Accuracy Shipping Limited

P E R F E C T I O N I S A N A T T I T U D E

May 30th, 2023

To,
National Stock Exchange Of India Ltd
Exchange Plaza, Plot No. C/1, G Block,
Bandra Kurla Complex,
Bandra (East), Mumbai – 400 051

NSE Symbol: ACCURACY

Sub: Annual Secretarial Compliance Report for the financial year 2022-23

Dear Sir / Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report of the Company dated May 27th, 2023 issued by M/s Piyush Prajapati & Associates, Practicing Company Secretaries, for the financial year 2022-23.

This is for your information and records.

Yours faithfully,
For Accuracy Shipping Limited

VINAY DINANATH TRIPATHI
(Managing director)
DIN : 02344536

GST No : Gujarat - 24AAHCA3717A1ZB,
GST No : Maharashtra - 27AAHCA3717A1Z5,
GST No : Tamilnadu - 33AAHCA3717A1ZC,
GST No : West Bengal - 19AAHCA3717A1Z2.

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PAN No. AAHCA3717A
Reg. No. MTO/DGS/883/APR/2022
TAN No. RKTA02447E
CIN No. L52321GJ2008PLC05532

(Formerly Known As Accuracy Shipping Pvt.Ltd)
Head Office : ASL House. Plot No. 11, Survey No. 42, Nr. Genus Factory,
Indian Oil Petrol Pump Road, Meghpar Borichi, Anjar Kutch - 370 110. (Gujarat, India)
Subject To Gandhidham Jurisdiction



SECRETARIAL COMPLIANCE REPORT OF ACCURACY SHIPPING LIMITED FOR THE YEAR ENDED 31ST MARCH, 2023

I Piyush Babubhai Prajapati, Proprietor of M/s Piyush Prajapati & Associates, Company Secretaries in Practice, have examined:

(a) all the documents and records made available to us and explanation provided by **ACCURACY SHIPPING LIMITED (CIN-L52321GJ2008PLC055322)** having its Registered office at **SURVEY NO : 42, PLOT NO : 11 MEGHPAR BORICHI ANJAR Kachchh GJ 370110 IN** (herein after referred as "the listed entity").

(b) the filings/ submissions made by the listed entity to the stock exchanges,

(c) website of the listed entity, (website address: www.aslindia.net)

(d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st march, 2023 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;

(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 for the period under review**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not applicable for the period under review**





PIYUSH PRAJAPATI & ASSOCIATES

Company Secretaries

Office No. 8, Plot No. 306, First Floor, Ward 12-B, "Hari Krupa Complex", Gandhidham - 370 201.
Cell : +91 - 99780 05437 / 99258 35529 Email : cspiyushprajapati@gmail.com

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable for the period under review**

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not applicable for the period under review**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

(j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the review period:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder except the following:-

Sr. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Remarks
As per annexure A										

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Remarks
As per annexure A										





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I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance 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), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	
2.	Adoption and timely updation of the Policies: - All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities -All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes Yes	
3.	Maintenance and disclosures on Website: -The Listed entity is maintaining a functional website -Timely dissemination of the documents/information under a separate section on the website -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	Yes Yes Yes	
4.	Disqualification of Director: None of the Directors of the Company is disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: a) Identification of material subsidiary companies b) Disclosure requirement of material as well as other subsidiaries	Not Applicable Yes	The Listed Entity does not have a Material Subsidiary Company
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	
7.	Performance Evaluation: 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	





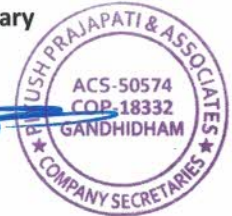
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8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes Not Applicable	All Related party Transactions were entered into after obtaining prior approval of audit Committee.
9.	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	
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	
11.	Actions taken by SEBI or Stock Exchange(s), if any: No Actions 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.	Yes	
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	

For Piyush Prajapati & Associates
Practicing Company Secretary



Piyush Babubhai Prajapati
(Proprietor)

Membership No. A50574

C.P. No. 18332

PR.NO. 1443/2021

UDIN: A050574E000396964

Place: Gandhidham

Date: 27th May, 2023

Annexure- A

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below

Sr. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Regulation 23(9) of SEBI (LODR) Regulation, 2015 ("Listing Regulation")	Reg 23(9)	As per the provision of Regulation 23(9) of SEBI (LODR) Regulation, 2015, the Company is required to file Disclosure disclosures every six months within fifteen days from the date of publication of its standalone consolidated financial results. However the company has filed disclosure in delay of 16 days in filing for March 2022 quarter.	NSE	Fine	There was delay in filing of Related party transaction disclosure for March 2022 quarter and it is violation of Regulation 23(9) of SEBI (LODR) Regulation, 2015 ("Listing Regulation")	Rs. 5000 per day on the Company. As the disclosure was filed within 16 days delay, the penalty was 5000 +18% GST aggregating to Rs. 94,400.	The Company has delayed in filing of Related party transaction disclosure which is violation of Regulation 23(9) of SEBI (LODR) Regulation, 2015 ("Listing Regulation"). However, the Company has filed the same and also paid fine levied by the NSE.	Due to the amendment effective from September 30th, 2021, there has been an unintentional delay in submitting the disclosure for related party transactions for the March 2022 quarter.	The Company has delayed in filing of Related party transaction disclosure and then the Company has filed the same and also paid fine levied by the NSE.



(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Regulation 29(2)(a) of SEBI (LODR) Regulation,	Reg 29(2)(a)	As per the provision of Regulation 29(2)(a) of SEBI (LODR) Regulation, 2015, prior intimation of Board meeting for Financial Result shall be given at least 5 days in advance (excluding the date of the intimation and date of meeting), and such intimation shall include the date of meeting of the Board of Directors. However, the company has filed intimation in delay of 1 day.	NSE	Fine	There was delay in filling of prior intimation of Board meeting for Financial Result for September 2021 quarter and it is violation of Regulation 29(2)(a) of SEBI (LODR) Regulation, 2015.	Rs. 10,000	The Company has delayed in filling of prior intimation of Board meeting for Financial Result which is violation of Regulation 29(2)(a) of SEBI (LODR) Regulation, 2015. However, there was one day delay the Company also paid fine levied by the NSE.	Due to several factor beyond the control of the management	The Company has delayed in filling of prior intimation of Board meeting for Financial Result and then the Company has filed the same and also paid fine levied by the NSE.

