

Date: 30/05/2025

To,

BSE Limited, Listing Department, Phirozejeebhoy Towers, Dalal Street- Fort, Mumbai- 400 001 <b>Scrip Code – 532904</b>	To, The listing department, National Stock Exchange of India Limited, Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai- 400051 <b>NSE Symbol: SUPREMEINF</b>
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Respected Sir/ Ma'am,

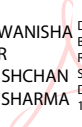
Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2025

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 March 31, 2025, issued by M/s. Amruta Giradkar & Associates.

Kindly take the above information on record.  
Thanking you.

Yours faithfully,

For **Supreme Infrastructure India Limited**

  
BHAWANISHA Digitally signed by  
NKAR BHAWANISHANKAR  
HARISHCHANDRA  
HARISHCHANDRA SHARMA  
DRA SHARMA Date: 2025.05.30  
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**Bhawanishankar Harishchandra Sharma**  
**Director**  
**DIN: 01249834**

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**SUPREME INFRASTRUCTURE INDIA LIMITED**

Supreme House, Plot No.94/C, Pratap Gad, I.I.T. Main Gate, Powai, Mumbai – 400 076

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CIN: L74999MH1983PLC029752



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF  
SUPREME INFRASTRUCTURE INDIA LIMITED  
FOR THE YEAR ENDED MARCH 31, 2025**

We Amruta Giradkar & Associates have examined:

- a) All the documents and records made available to us and explanation provided by Supreme Infrastructure India Limited ("the listed entity"). The company is listed at BSE Limited and National Stock Exchange of India Limited.
- b) The filings/ submissions made by the listed entity to the stock exchanges.
- c) website of the listed entity is updated as per the provisions of Listing Regulations
- d) Any other document/ filing, as may be relevant, which has been relied upon to make this report.

For the financial year ended March 31, 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;
- 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; (Not applicable during the period under review)
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable during the period under review)
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021. (Not applicable during the period under review)
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021. (Not applicable during the period under review)
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (Not applicable during the period under review)
- h) Other regulations as applicable and circulars/ guidelines issued thereunder

a. Further, based on the above examination, we hereby report, during the review period that:

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	Deviation	Action Taken By	Type of Action	Detail of Violation	Fine Amount	Observation / Re-mark of the Practice Company Secretary	Management response	Re-mark
1	*Compliance Under Regulation 6(1) of SEBI (LODR) Regulations, 2015 For the Quarter ended March 2025	6(1)	Appointment of a qualified company secretary as the compliance officer	SEBI	Penalty/ Fine imposed	Delay in Appointment	Rs. 87,320	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
2	*Compliance Under Regulation 31 of SEBI (LODR) Regulations, 2015 For the Quarter ended March 2025	31	Non-submission of shareholding pattern within the period prescribed	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 31	Rs. 16,520	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
3	*Compliance Under Regulation 27(2) of SEBI (LODR) Regulations, 2015 For the Quarter ended December 2024	27(2)	Non-submission of the Corporate governance compliance report within the period provided under this regulation	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 27(2)	Rs. 1,06,200	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending



4	*Compliance Under Regulation 33 of SEBI (LODR) Regulations, 2015 For the Quarter ended December 2024	33	Non-submission of the financial results within the period prescribed under this regulation	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 33	Rs. 2,36,000	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
5	*Compliance Under Regulation 13(3) of SEBI (LODR) Regulations, 2015 For the Quarter ended December 2024	13(3)	Non-submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 13(3)	Rs. 47,200	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
6	*Compliance Under Regulation 27(2) of SEBI (LODR) Regulations, 2015 For the Quarter ended December 2024	27(2)	Non-submission of the Corporate governance compliance report within the period provided under this regulation	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 27(2)	Rs.68,440	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
7	*Compliance Under Regulation 13(3) of SEBI (LODR) Regulations, 2015 For the Quarter ended December 2024	13(3)	Non-submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 13(3)	Rs. 28,320	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending



8	*Compliance Under Regulation 33 of SEBI (LODR) Regulations, 2015 For the Quarter ended December 2024	33	Non-submission of the financial results within the period prescribed under this regulation	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 33	Rs. 1,41,600	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
9	*Compliance Under Regulation 31 of SEBI (LODR) Regulations, 2015 For the Quarter ended December 2024	31	Non-submission of shareholding pattern within the period prescribed	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 31	Rs. 96,760	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
10	*Compliance Under Regulation 31 of SEBI (LODR) Regulations, 2015 For the Quarter ended December 2024	31	Non-submission of shareholding pattern within the period prescribed	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 31	Rs. 56,640	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
11	*Compliance Under Regulation 33 of SEBI (LODR) Regulations, 2015 For the Quarter ended September 2024	33	Non-submission of the financial results within the period prescribed under this regulation	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 33	Rs.2,53,700	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending



12	*Compliance Under Regulation 33 of SEBI (LODR) Regulations, 2015 For the Quarter ended September 2024	33	Non-submission of the financial results within the period prescribed under this regulation	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 33	Rs.1,53,400	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
13	*Compliance Under Regulation 31 of SEBI (LODR) Regulations, 2015 For the Quarter ended September 2024	31	Non-submission of shareholding pattern within the period prescribed	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 31	Rs. 7,080	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
14	*Compliance Under Regulation 44(3) of SEBI (LODR) Regulations, 2015 For the Quarter ended October 2024	44(3)	Non-submission of the voting results within the period provided under this regulation	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 44(3)	Rs. 11,800	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
15	*Compliance Under Regulation 27(2) of SEBI (LODR) Regulations, 2015 For the Quarter ended September 2024	27(2)	Non-submission of the Corporate governance compliance report within the period provided under this regulation	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 27(2)	Rs.2,360	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending



16	*Compliance Under Regulation 29(2)/29(3) of SEBI (LODR) Regulations, 2015 For the Quarter ended September 2024	29(2)/29(3)	Delay in furnishing prior intimation about the meeting of the board of directors	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 29(2)/29(3)	Rs. 11,800	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
17	*Compliance Under Regulation 33 of SEBI (LODR) Regulations, 2015 For the Quarter ended June 2024	33	Non-submission of the financial results within the period prescribed under this regulation	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 33	Rs.2,71,400	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
18	*Compliance Under Regulation 33 of SEBI (LODR) Regulations, 2015 For the Quarter ended June 2024	33	Non-submission of the financial results within the period prescribed under this regulation	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 33	Rs.1,71,100	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
19	*Compliance Under Regulation 6(1) of SEBI (LODR) Regulations, 2015 For the Quarter ended June 2024	6(1)	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer	SEBI	Penalty/ Fine imposed	Delay in Appointment	Rs. 74,340	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending



20	*Compliance Under Regulation 19(1)/19(2) of SEBI (LODR) Regulations, 2015 For the Quarter ended June 2024	19(1)/19(2)	Non-compliance with the constitution of nomination and remuneration committee	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 19(1)/19(2)	Rs. 2,14,760	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending
21	*Compliance Under Regulation 20(2)/ (2A) of SEBI (LODR) Regulations, 2015 For the Quarter ended June 2024	20(2)/ (2A)	Non-compliance with the constitution of stakeholder relationship committee	SEBI	Penalty/ Fine imposed	Late Submission under Regulation 20(2)/ (2A)	Rs. 2,14,760	The payment in respect of the said fine is pending	Company submitted all the required details.	The payment in respect of the said fine is pending

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

Sr. No.	Observations/ Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended 2024 (the years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	The Company has complied Regulation 33 (For the Quarter ended June 2023 (late Submission)	The company has failed to do Quarterly /Yearly Compliances with in prescribe time limit	Regulation 33	Late Submission hence Penalty imposed The Company has complied Regulation 33	Penalty has been paid on account of late submission.	Company has complied the regulation and paid the fine (late Submission)
2	The Company has complied Regulation 31 (For the Quarter ended June 2023) late Submission)	The company has failed to do Quarterly /Yearly Compliances	Regulation 31	Late Submission hence Penalty imposed	Penalty has been paid on account of late submission	Company has complied the regulation and paid the fine (late Submission)

		with in prescribe time limit		The Company has complied Regulation 31		
3	The Company has complied Regulation 33(For the Quarter ended September 2023). (late Submission)	The company has failed to do Quarterly /Yearly Compliances with in prescribe time limit	Regulation 33	Late Submission hence Penalty imposed The Company has complied Regulation 33	Penalty has been paid on account of late submission	Company has complied the regulation and paid the fine (late Submission)
4	Delay in Appointment.	The Company is unable to fill the vacant position of Company Secretary within 6 months from the Resignation. As the company was in search of an appropriate candidate	Regulation 6(1)	Delay in appointment of Compliance officer.	Penalty has been paid .	Company fails to appoint the compliance officer within prescribe time limit
5	The Company has complied Regulation 33 (For the Quarter ended December 2023) (late Submission)	The company has failed to do Quarterly /Yearly Compliances with in prescribe time limit	Regulation 33	Late Submission under Regulation 33	Penalty has been paid on account of late submission	Company has complied the regulation and paid the fine (late Submission)

We have examined the compliance of above regulations, circulars, guidelines issued thereunder as applicable during the review period and based on confirmation received from management of the Company as and wherever required and affirm that:

Sr No.	Particular	Compliance status (Yes/No/Na)	Observations/ Remarks by PCS*
1.	<p><b>Secretarial Standards:</b> The compliances of the company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p> <p>We have examined the Secretarial Standards issued by Institute of Company Secretaries of India and as notified by Ministry of Corporate Affairs.</p>	No	<p>AGM for the Financial year 2023-2024 was not conducted in the prescribed time.</p> <p>The compliances of the company are not in accordance with the applicable Secretarial Standards (SS)</p>

			issued by the Institute of Company Secretaries India (ICSI)
2.	<p><b>Adoption and timely updating of the Policies:</b></p> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company</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
3.	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>The Company 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 updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	YES	The Company maintains a functional website as per SEBI (LODR) Regulations, 2015; however, certain disclosures were not updated in a timely manner during the review period.
4.	<p><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 Company.</p>	YES	None
5.	<p><b>Details related to Subsidiaries of the Company have been examined w.r.t.:</b></p> <ul style="list-style-type: none"> <li>Identification of material subsidiary companies</li> <li>Disclosure requirement of material as well as other subsidiaries</li> </ul>	YES	None
6.	<p><b>Preservation of Documents:</b> The company 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.</p>	YES	None
7.	<p><b>Performance Evaluation:</b> The company 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.</p>	YES	Based on the Statutory Registers, Attendance and Performance of the Company

8.	<b>Related Party Transactions:</b> <ul style="list-style-type: none"> <li>The company has obtained prior approval of Audit Committee for all related party transactions; or</li> <li>The company 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.</li> </ul>	YES	None
9.	<b>Disclosure of events or information:</b> The Company 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	Relevant documents and communications sent to the Stock Exchanges/ROC
10.	<b>Prohibition of Insider Trading:</b> The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	None
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No action(s) has been taken against the Company/ 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.	NA	None
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	YES	The auditors have not resigned during the year
13.	<b>Additional non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	None

We further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. – NOT APPLICABLE

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

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the Company.



2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the Company.
4. 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 Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

**Place: Mumbai**  
**Date: May 30, 2025**

**UDIN: A048693G000506832**

**For Amruta Giradkar & Associates**

AMRUTA  
NARENDRA  
GIRADKAR

Digitally signed by AMRUTA  
NARENDRA GIRADKAR  
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**ACS No.: A48693**  
**CP No. : 19381**