Date: May 26, 2026

To
BSE Limited
Department of Corporate Services/
Corporate Relation Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001
Maharashtra, India

To
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G
Bandra Kurla Complex, Bandra (E)
Mumbai – 400 051
Maharashtra, India

Ref- BSE: Scrip Code: 539407

NSE Symbol: GENCON

Subject: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31st March 2026 under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, we are enclosing herewith the Annual Secretarial Compliance Report issued by the Practicing Company Secretary, for the financial year ended 31st March 2026.

Thanking you,
Yours sincerely,

For and on behalf of
Generic Engineering Construction and Projects Limited

SIMRAN AGRAWAL
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DN: c=IN, o=Personal, 2.5.4.20=ddc183d281105192f20b99cc70d1d1b8776f69c9ef0fc0ba2f80aec812127468, postalCode=313001, st=Rajasthan, serialNumber=5d4759a02470e8282fd45e98e70bf1dd27bd598d3199507198e2e8bdbbe5cda4, cn=SIMRAN AGRAWAL
Date: 2026.05.26 13:06:43 +05'30'

Simran Agrawal
Company Secretary
Membership Number: A72791
ADD: 40, North Ayad, Ayad (Rural)
Udaipur Shastri Circle, Girwa,
Udaipur-313001 Rajasthan, India.

Place: Mumbai

Secretarial compliance report of

Generic Engineering Construction and Projects Limited for the year ended 31st March 2026

To,

The Board of Directors
Generic Engineering Construction and Projects Ltd

I have conducted the review of the compliance of the applicable statutory provisions and adherence to good corporate practices by ***Generic Engineering Construction and Projects Ltd*** (hereinafter called "**the listed entity"**). Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/ statutory compliances and expressing my opinion thereon.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on 31st March, 2026 ("**Audit Period/period under review**") complied with the statutory provisions listed hereunder and also that the Company has proper Board−processes and compliance−mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined:

a) all the documents and records made available to us and explanation provided by Generic Engineering Construction and Projects Ltd ("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 certification,

for the year ended 31 March 2026 ("Review Period") 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 (SEBI LODR);
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

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Takeovers) Regulations, 2011;

d) Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018 **(Not applicable to the listed entity during the Review Period);**

e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the listed entity during the Review Period);**

f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021**; (Not Applicable during the year under review);**

g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013**- (Not Applicable during the year under review);**

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

i) SEBI (Depositories and Participants) Regulations, 1996;

and circulars/ guidelines/Master direction issued thereunder.
and based on the above examination, I hereby report that, during the Review Period:

I. (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:

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

Sr. No	1
Compliance Requirement (Regulations/circulars / guidelines including specific clause)	Regulation 23 (9) The listed entity shall submit to the stock exchanges disclosures of related party transactions in the format as specified by the Board from time to time, and publish the same on its website.
Regulation/Circular no.	Regulation 23(9) of SEBI LODR
Deviations	Delay in submission of Related Party Transactions.
Action taken by	NSE
Type of action	The NSE levied penalty of Rs 5900 due to delay of one day in submission Related party transactions which are part of Financial Statement.
Details of Violation	Since the related party transactions form part of Integrated filing of Financial statements under Regulation 33 of the SEBI LODR, the NSE levied penalty

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	for delay in submission of related party transactions under Regulation 23(9).
Fine Amount	The NSE has fine of Rs 5900 for delay of one day.
Observations/ Remarks of the Practicing Company Secretary	The Company has made the payment of fine amount as levied by the NSE.
Management response	The Company has paid the fine amount initially but has applied for waiver application for the penalty paid stating the reason that delay was due to technical error while submission, in reply waiver application has been approved by the Waiver Committee of NSE. Now the Company is in follow up with Stock Exchange for refund of penalty paid.
Sr. No	2
Compliance Requirement (Regulations/circulars / guidelines including specific clause)	Regulation 31(1) (b) The Listed Entity shall submit Shareholding pattern for the quarter with 21 days from end of the each quarter.
Regulation/Circular no.	Regulation 31(1)(b) of SEBI LODR
Deviations	There was a delay in submission of Shareholding pattern by one day to NSE.
Action taken by	NSE
Type of action	A fine of Rs. 2,000 + GST (each) was levied by the exchanges NSE.
Details of Violation	The Company has not submitted Shareholding Pattern for the quarter ended December, 2025 as per the requirement of regulation 31 (1) (b) of the SEBI LODR 2015.
Fine Amount	Rs. 2,000/- plus applicable GST was levied on the Company
Observations/ Remarks of the Practicing Company Secretary	The Company has paid the penalty levied by the NSE but since the delay is due to technical error, the

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	Company filed Waiver Application to NSE which is approved by waiver committee of NSE.
Management response	The management has is in follow up NSE team for recovery of penalty paid as the waiver application is approved by Waiver committee of NSE.

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

Sr. No.	1
Observations/ Remarks Of the Practicing Company Secretary In the previous reports	There was delay Delay in making payment of listing fees to BSE & NSE. The interest on delay of payment of listing fees were levied by the both exchanges i.e BSE and NSE. The Company has rectified the Non-Compliance by making payment of listing fees along with interest thereon.
Observations Made in the Secretarial compliance report for the year ended 2024	
Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation 14 Every listed entity shall pay annual listing fees within the period of 30 days from close of the financial year.
Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	There was a Delay in making payment of listing fees to BSE & NSE.
Remedial actions, if any, taken by the listed entity	The Company has rectified the Non compliance by making payment of listing fees along with interest to BSE & NSE.

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Comments of the PCS on the actions taken by the listed entity	
Sr. No.	2
Observations/ Remarks Of the Practicing Company Secretary In the previous reports	The Company has not given prior intimation of Board meeting as per the requirement of regulation 29 of the SEBI LODR 2015 for the quarter ended June 2024 and September, 2024.
Observations Made in the Secretarial compliance report for the year ended 2024	
Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation 29 (2) The intimation required under sub regulation (1) shall mention the date of such meeting of board of directors. (1) The listed entity shall give prior intimation of at least two working days in advance, excluding the date of the intimation and date of the meeting, to stock exchange about the meeting of the board of directors in which any of the following proposals is due to be considered: (a) financial results viz. quarterly, half yearly, or annual, as the case may be;.
Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	The Company has not given prior intimation of Board meeting as per the requirement of regulation 29 of the SEBI LODR 2015 for the quarter ended June 2024 and September, 2024 and A fine of Rs. 10,000 + GST (each) was levied by both the exchanges i.e BSE and NSE.
Remedial actions, if any, taken by the listed entity	The Company has rectified the Non compliance and the Company has paid the penalty levied by the exchanges.
Comments of the PCS on the actions taken by the listed entity	
Sr. No.	3
Observations/ Remarks Of the Practicing Company Secretary In the previous reports	The Company has submitted the financial results for the quarter ending June 2024 , September 2024 and December, 2024 with a delay of 127, 33, and 18 days respectively.

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Observations Made in the Secretarial compliance report for the year ended 2024	
Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation 33 (3) The listed entity shall submit the financial results in the following manner: (a) The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter.
Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	The Company has submitted the financial results for the quarter ending June 2024 , September 2024 and December, 2024 with a delay of 127, 33, and 18 days respectively. A fine of Rs. 5000/- per day for each day aggregating to Rs. 8,90,000/- each plus applicable GST was levied on the Company which was to be paid within 15 days of Receipt of notice.
Remedial actions, if any, taken by the listed entity	the Company has submitted the financial results for the quarter ending June 2024, September 2024 and December, 2024 with a delay of 127, 33, and 18 days respectively. The company has paid the penalty amount levied by the exchanges.
Comments of the PCS on the actions taken by the listed entity	
Sr. No.	4
Observations/ Remarks Of the Practicing Company Secretary In the previous reports	The Company has submitted the disclosure of related party transaction for the quarter ending March 2025, with a delay of 8 days.
Observations Made in the Secretarial compliance report for the year ended 2024	
Compliance Requirement (Regulations/ circulars/ guidelines	Regulation 23 (9) The listed entity shall submit to the stock exchanges disclosures of related party

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including specific clause)	transactions in the format as specified by the Board from time to time, and publish the same on its website.
Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	The Company has submitted the disclosure of related party transaction for the quarter ending March 2025, with a delay of 8 days. A fine of Rs. 5000/- per day for each day aggregating to Rs. 40,000/- each plus applicable GST was levied on the Company which was to be paid within 15 days of Receipt of notice by BSE
Remedial actions, if any, taken by the listed entity	The Company has submitted the disclosure of related party transaction for the quarter ending March 2025 and paid the penalty levied by the stock exchanges.
Comments of the PCS on the actions taken by the listed entity	
Sr. No.	5
Observations/ Remarks Of the Practicing Company Secretary In the previous reports	Non-Compliance of Regulation 34 (1), The Company has submitted the annual report with the delay of 2 days.
Observations Made in the Secretarial compliance report for the year ended 2024	
Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation 34 (1) The listed entity shall submit to the stock exchange and publish on its website (a) a copy of the annual report sent to the shareholders along with the notice of the annual general meeting on or before the commencement of dispatch to its shareholders; (b) in the event of any changes to the annual report, the revised copy along with the details of and explanation for the changes shall be sent not later than 48 hours after the annual general meeting.
Details of violation / deviations and actions taken / penalty	The Company has submitted the annual report with the delay of 2 days. A fine of Rs. 2,000/- per day for each day aggregating to Rs. 4,000/- each plus applicable GST was levied on

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imposed, if any, on the listed entity	the Company which was to be paid within 10 days of Receipt of notice
Remedial actions, if any, taken by the listed entity	The Company has submitted the annual report with the delay of 2 days and paid the penalty levied by the stock exchanges.
Comments of the PCS on the actions taken by the listed entity	
Sr. No.	6
Observations/ Remarks Of the Practicing Company Secretary In the previous reports	Non-Compliance of Schedule XIX-Para (2)– Listing of Securities on Stock Exchanges of ICDR Regulations. The issuer shall make an application for listing, from the date of allotment, within such period as may be specified by the Board from time to time, to one or more recognized stock exchange(s). The application with NSE for the conversion of warrants into the Equity shares were submitted with 1 day delay.
Observations Made in the Secretarial compliance report for the year ended 2024	
Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	The application with NSE for the conversion of warrants into the Equity shares were submitted with 1 day delay .
Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Schedule XIX-Para (2)– Listing of Securities on Stock Exchanges of ICDR Regulations. The issuer shall make an application for listing, from the date of allotment, within such period as may be specified by the Board from time to time, to one or more recognized stock exchange(s). The application with NSE for the conversion of warrants into the Equity shares were submitted with 1 day delay. Rs. 20,000/- plus applicable GST was levied on the Company

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Remedial actions, if any, taken by the listed entity	The Company has filed the necessary documents with the exchanges and paid the penalty levied by the stock exchanges.
Comments of the PCS on the actions taken by the listed entity	

II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th 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 the 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 such event during the review period
	ii. if the auditor has resigned after 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 as well as the next quarter; or	NA	No such event during the review period
	iii. if the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	No such event during the review period
2	**Other conditions relating to resignation of statutory auditor**		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:	NA	No such event during the review period

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	a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / noncooperation 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.	NA	None
	b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to 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 the management, as applicable.	NA	None
	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.	NA	None
	ii. Disclaimer in case of non-receipt of information:	NA	None
	The auditor has provided an appropriate disclaimer in its audit report, which isin 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	None
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/	NA	None

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	CFD/CMD1 /114/2019 dated 18th October, 2019.		

III. I report below the compliance status by the listed entity of the items stated in the table:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks by PCS*
1	**Secretarial Standards:**	No	The secretarial records were meticulously prepared in accordance with the requirements of the Secretarial Standards. However, there was a partial shortage of documents related to delivery proof.
	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.		
2	**Adoption and timely Updation of the Policies:**	Yes	None
	All applicable policies under SEBI Regulations are adopted with the approval of board of directors		
	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		
3	**Maintenance and disclosures on Website:**	Yes	None
	The Company is maintaining a functional website		
	Timely dissemination of the documents/ information under a separate section on the website		

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	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		
4	**Disqualification of Director:**	Yes	None
	None of the Director(s) of the listed entity are disqualified under Section 164 of Companies Act, 2013 as confirmed by the Company.		
5	**To examine details related to Subsidiaries of listed entity:**		
	(a) identification of material subsidiary companies	Yes	None
	(b) Disclosure requirement of material as well as other subsidiaries	Yes	None
6	**Preservation of Documents:**	Yes	None
	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.		
7	**Performance Evaluation:**	Yes	None
	The listed entity has conducted performance evaluation of the Board, independent Directors and the Committees during the financial year as prescribed in SEBI Regulations.		
8	**Related Party Transactions:**		
	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	None
	(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.	NA	
	Disclosure of events or information:		

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9	The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule 111 of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
10	**Prohibition of Insider Trading:**	Yes	None
	The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.		
11	**Actions taken by SEBI or Stock Exchange(s), if any:**	Yes	Refer point I (a)
	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.		
12	**Additional Non-compliances, if any:**		
	No additional non-compliance observed for all regulation and circular /guidance note, etc.	N.A	No such observation

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 listed entity.
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 listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A(2) of SEBI (LODR) Regulations 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.

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For Yatin Sangani & Associates,
Company Secretaries
Firm U.I.N. – I2019MH2011200

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Yatin Sangani
Proprietor
ACS – 33246
COP – 22681
UDIN: A033246H000444932
Peer Review Firm No. 3832/2023
Date: 22.05.2026
Place: Mumbai