

AVISHKAR INFRA REALTY LIMITED
Reg. Office: Plot 239-5 Floor-GRD, 239 Yusuf Palace, LadyJamshedji
Road Shivaji Park Mahim Mumbai, Mahim, Mumbai, Mumbai,
Maharashtra, India, 400016
CIN: L65910MH1983PLC031230
Email id: Compliance.joyrealty@gmail.com

Date: 28/05/2026

The Secretary

The Bombay Stock Exchange Limited,
Phiroze Jeejeebhoy Towers,

Dalal Street,

Mumbai- 400001.

Listing Compliance Department.

MSEI Ltd,
Building A, Unit 205A, 2nd Floor,
Piramal,
Agastya Corporate Park, Lal Bahadur
Shastri Marg,
Kurla West, Kurla, Mumbai,
Maharashtra 400070

Subject: Annual Secretarial Compliance Report for the year ended
March 31, 2026.

BSE Scrip Code: 508929

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular CIR/CFD/CMD1/27/2019, dated February 08, 2019, we enclose herewith the Annual Secretarial Compliance Report issued by Mrs. Megha Kamal Samdani, Practising Company Secretary, Proprietor of M/s. M K & Co., Company Secretaries for the year ended March 31, 2026.

You are requested to take the same on your record.

Thanking you,

Yours faithfully,

For AVISHKAR INFRA REALTY LIMITED

Komal keshwani
Compliance Office & Company Secretary

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SECRETARIAL COMPLIANCE REPORT OF AVISHKAR INFRA REALTY LIMITED FOR THE FINANCIAL YEAR ENDED ON MARCH 31, 2026

I, **Megha Kamal Samdani**, proprietor of **M K & Co., Company Secretaries**, have conducted the review of the compliance of applicable statutory provisions and adherence to good corporate practices by **AVISHKAR INFRA REALTY LIMITED (CIN: L65910MH1983PLC031230)** (hereinafter referred to as "the listed entity"), having its registered office at **Plot 239-5 Floor-GRD, 239 Yusuf Palace, Lady Jamshedji Road Shivaji Park Mahim Mumbai, Mahim, Mumbai, Mumbai, Maharashtra, India, 400016.**

The secretarial review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my observations thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed, and other records maintained by the listed entity, along with the information provided by its officers, agents, and authorized representatives during the conduct of the review, I hereby report that the listed entity has complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter.

I, **Megha Kamal Samdani**, proprietor of **MK SAMDANI & Co., Company Secretaries**, have examined:

1. All documents and records made available to me and explanations provided by the listed entity;
2. Filings/submissions made by the listed entity to the stock exchanges;
3. Website of the listed entity;
4. Any other documents/filings that may be relevant and relied upon for this report.

For the financial year ended **March 31, 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;

b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder, and the regulations, circulars, guidelines issued thereunder by SEBI.

The specific regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- a) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;



MK SAMDANI & CO. COMPANY SECRETARIES

- c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) SEBI (Buyback of Securities) Regulations, 2018; **(Not Applicable during the review period)**
- e) SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable during the review period)**
- f) SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable during the review period)**
- g) SEBI (Prohibition of Insider Trading) Regulations, 2015;
- h) SEBI (Depository and Participants) Regulations, 2018.

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

I. Compliance Overview:

(a) During the review period, the listed entity has **complied** with the provisions of applicable regulations and circulars/guidelines issued thereunder, **except for the following observations:**

Sr. No.	Compliance Requirement (Regulation/Circular/Guideline including specific clause)	Regulation /circular no.	Deviations	Action taken by	Type of action	Details of violation	Amount of fine	Observation/remark of the practicing company secretary	Management Response	Remark

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

Sr. No.	Compliance Requirement (Regulation/Circular/Guideline including specific clause)	Regulation /circular no.	Deviations	Action taken by	Type of action	Details of violation	Amount of fine	Observation/remark of the practicing company secretary	Management Response	Remark

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



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Sr. No.	Particulars	Compliance (Yes/No)	status	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 of India (ICSI).	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), maintaining a section of the website.	Yes Yes Yes		
4	Disqualification of Director: 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		



G-204 2ND Floor Sumel 11, Indian Taxtile Plaza, Namste Circle, Sahibaug, Ahmedabad-380004



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	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 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.	Yes	
12	Resignation of statutory auditors from listed entity or its material subsidiaries: from the listed entity or its material subsidiaries: 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.	NA	There was no such resignation from statutory auditor
13	Additional Non-compliances, if any: <u>1. Delay in Submission of Integrated Filing (Governance) for 31st December 2025.</u> <u>2. Delay in Submission of Reconciliation of Share Capital Audit Report for 31st December, 2025.</u>	Yes Yes	The report was not submitted within the requisite time frame as mandated. The report was not submitted within the requisite time frame as mandated.



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	<u>3. The Consolidated Statement of Cash Flow for the Year Ended 31st March 2025 was not enclosed herewith.</u>	Yes	Consolidated Cash Flow Statement was omitted in the PDF format of the submission. and the same has been updated in XBRL which we have been submitted on Bombay Stock Exchange.
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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 report 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 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, MK SAMDANI & Co.
Company Secretaries**

**Megha Kamal Samdani
Proprietor
ACS: 41630
COP: 21853
PR No.: 3320/2023
Date: 27/05/2026
Place: Ahmedabad
UDIN: A041630H000500101**

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