

Dated: May 30, 2025

To,

The Corporate Relations Department. BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai-400001 Script Code: 532986	National Stock Exchange of India Exchange Plaza Bandra Kurla Complex, Bandra East Mumbai 400 051 Script Symbol : NIRAJ
---	--

Dear Sir/Madam

Sub: Annual Secretarial Compliance Report for the period ended March 31, 2025.

In terms of Regulation 24A of SEBI (Listing and Obligations and Disclosure Requirements) Regulation, 2015 read with SEBI Circular No. CIR/CFD/CMD/27/2019 dated February 8, 2019, please find enclosed herewith Annual Secretarial Compliance Report dated May 29, 2025 for the Financial Year 2024-25 issued by M/s. AJP & Associates, Practicing Company Secretary.

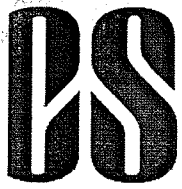
Kindly take the information on records and oblige.

Thanking you,

Yours Faithfully

For Niraj Cement Structurals Limited

Anil Anant Jha
Company Secretary & Compliance Officer
ACS: 66063



AJP & ASSOCIATES

Company Secretaries & Trademark Agent

SECRETARIAL COMPLIANCE REPORT
OF
NIRAJ CEMENT STRUCTURALS LIMITED
(For the year ended March 31, 2025)

Under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

To,

NIRAJ CEMENT STRUCTURALS LIMITED

Unit No. 820 to 825, Commercial Building,

Wadhwa Dukes Horizon, Pepsi Company,

Off. Sion Trombay Road, Nr. R K Studio,

D G Patil Road, Mumbai- 400088,

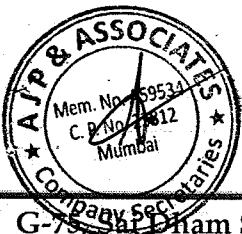
Maharashtra, INDIA.

I, Abhaykumar J. Pal have examined:

- (a) all the documents and records made available to us and explanation provided by **Niraj Cement Structurals Limited** ("the Company" or "the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (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 financial year ended March 31, 2025 ("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");



G-75, Sai Dham Shopping Plaza, Nr. Sai Baba Mandir, P.K. Road, Mulund West, Mumbai-400080

+91 90293 66180 / 96534 33544 ● abhay@ajp.cs.in

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 (Buy-back of Securities) Regulations, 2018; *[Not applicable to the Company during the review period]*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2021; *[Not applicable to the Company during the review period]*
- (f) Securities and Exchange Board of India (Issue and Listing of Non Convertible Securities) Regulations, 2021; *[Not applicable to the Company during the review period]*
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (i) Securities and Exchange Board of India (Registrar to an issue and share transfer agent) Regulations, 1993;

and circulars/ guidelines issued thereunder and based on the above examination, I, 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 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 (PCS)	Management Response	Remarks
--	--	--	--	--	--	--	--	--	--	--

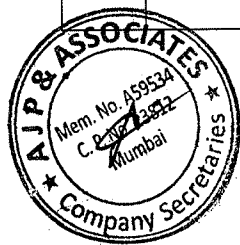
- (b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observation Made in the secretarial compliance report for the financial year ended	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
--	--	--	--	--	--	--

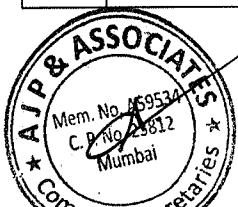


I. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

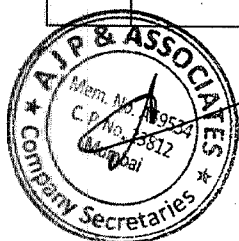
Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	YES	--
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> 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	--
3.	Maintenance and disclosures on the Website: <ul style="list-style-type: none"> 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 (s) of the Company is/ are disqualified under Section 164 of the 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.	YES	--
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 a 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	--
8.	Related Party Transactions: a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	YES	--



	b) In case no prior approval has been obtained, the listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.	NA	
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) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	--
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 (<i>including under the Standard Operating Procedures issued by SEBI through various circulars</i>) under SEBI Regulations and circulars/ guidelines issued there under except as provided under separate paragraph herein.	NA	--
12.	Resignation of statutory auditors 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	No such event of the resignation of a statutory auditor occurred during the review period.

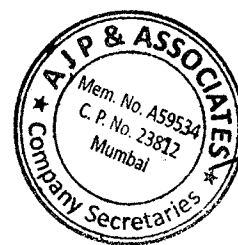


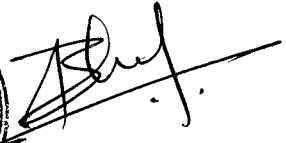
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc. except as reported above.	NA	--
-----	---	----	----

II. Assumptions and Limitations of the 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. My responsibility is to report based on my examination of relevant documents and information. This is neither an audit nor an expression of opinion;
3. I have not verified the correctness and appropriateness of the financial Records and Books of Accounts of the listed entity; and
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 AJP & ASSOCIATES
Company Secretaries




Abhay J. Pal
Proprietor
Mem. No. F13415 & CP. 23812
PR. 5861/2024

Date: 29/05/2025
Place: Mumbai
UDIN. F013415G000495919
URN. S2020MH767400