



R.J. SHAH & CO. LTD.
ENGINEERS & CONTRACTORS

MOBILE : 9869083044
E-MAIL : rjshahandco191@gmail.com
WEBSITE : www.rjshahandco.com
Regd. Office :
NEAR WADALA CONTAINER YARD,
MAHUL ROAD, ANTOP HILL,
MUMBAI - 400 037. (INDIA)
CIN NO. : L45202MH1957PLC010986
GSTIN : 27AAACR2584D1ZI

Date: May 29, 2026

To,
BSE Limited
25th Floor, P. J. Towers,
Dalal Street, Fort,
Mumbai - 400 001

Subject: Submission of Annual Secretarial Compliance Report for the financial year ended on 31st March, 2026

Scrip Code: 509845

Dear Sir/Madam,

Pursuant to the provisions of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Annual Secretarial Compliance Report of the Company for the financial year ended 31st March, 2026 issued by the Secretarial Auditor of the Company M/s. Alpesh Vekariya & Associates, Practising Company Secretaries.

You are requested to kindly take the above information on record.

Thank you.

Yours Faithfully

For, R J SHAH AND COMPANY LIMITED
CIN: L45202MH1957PLC010986

KALINDI RAJENDRA SHAH
Chairperson and Managing Director
DIN: 00402482



ALPESH VEKARIYA & ASSOCIATES

Company Secretaries

Alpesh Vekariya
FCS, MBA

SECRETARIAL COMPLIANCE REPORT OF R J SHAH AND COMPANY LIMITED FOR THE FINANCIAL YEAR ENDED MARCH 31, 2026

To,
The Board of Directors,
R J SHAH AND COMPANY LIMITED,
Mahul Road, Antop Hill,
Mumbai, MH-400037

We, **ALPESH VEKARIYA & ASSOCIATES, Company Secretaries**, have examined:

- all the documents and records made available to us and explanation provided by **R J SHAH AND COMPANY LIMITED** ("the Listed Entity"),
- the filings / submissions made by the Listed Entity to the Stock Exchange,
- website of the Listed Entity,
- any other document / filing, as may be relevant, which has been relied upon to make this Report,

for the year ended **March 31, 2026** ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, Circulars, Guidelines issued thereunder; and
- 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:

- the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - *(Not Applicable during the period under review)*;
- the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- the Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - *(Not Applicable during the period under review)*;
- the Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - *(Not Applicable during the period under review)*;
- the Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - *(Not Applicable during the period under review)*;
- the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and Circulars / Guidelines issued thereunder;

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

- 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 PCS	Management Response	Remarks
										NIL





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

Sr. No.	Observations / Remarks of the PCS in the previous reports	Observations made in the secretarial compliance report for the year ended..... (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 updated the Website substantially but advisable to upload the data as required under Regulation 46 of the SEBI (LODR) Regulations, 2015.	2023-24	Regulation 46 of the SEBI (LODR) Regulations, 2015.	Website was not updated as per Regulation 46 of the SEBI (LODR) Regulations, 2015.	The Company has taken necessary steps.	None
2	As per the clarification provided by the Company and from the revised CG Report submitted with Exchange, the Company had Independent Director as a Chairman as required under Regulation 17 of the SEBI (LODR) Regulations, 2015.	2024-25	Regulation 17 of the SEBI (LODR) Regulations, 2015.	Noncompliance with the requirements pertaining to the Composition of the Board	The Company has submitted waiver application based on email of the Stock Exchange dated July 29, 2024 and August 21, 2024.	None
3	Noncompliance with the requirements pertaining to the Constitution of Audit Committee for 36 Days as required under Regulation 18 of the SEBI (LODR) Regulations, 2015.	2024-25	Regulation 18 of the SEBI (LODR) Regulations, 2015.	Noncompliance with the requirements pertaining to the Constitution of Audit Committee.	The Company has submitted waiver application based on email of the Stock Exchange dated July 29, 2024 and August 21, 2024.	None
4	The Company has not submitted additional details as required under Regulation 30 of the SEBI (LODR) Regulations, 2015 in respect of corporate announcement for change in Director / KMP / Auditors / Compliance Officer (Reason / Date / Profile / Relationship) to the Stock Exchange.	2024-25	Regulation 30 of the SEBI (LODR) Regulations, 2015.	Details under SEBI Circular no. SEBI/HO/CFD/CFD-PoD-1/P/ CIR/2023/123 dated July 13, 2023 is not mentioned in announcement.	The Company has Submitted the fresh announcement based on the email dated April 10, 2024 of the Stock Exchange.	None
5	The Company has not submitted outcome of Board Meeting in time to the Stock Exchange as required under Regulation 30 of the SEBI (LODR) Regulations, 2015.	2024-25	Regulation 30 of the SEBI (LODR) Regulations, 2015.	Delay of 26 Minutes in submission of the disclosure of outcome of Board Meeting.	Necessary clarification with valid reason provided to the Stock Exchange.	None
6	The Company has not submitted the Statement of Impact of Audit Qualifications or Declaration of unmodified Audit Report in XBRL for the year ended March 31, 2024 in time to the Stock Exchange. However, the same has been submitted based on the email dated June 05, 2024 of the Stock Exchange.	2024-25	SEBI Master Circular No. SEBI/HO/CFD/ PoD2/ CIR/ P/ 2023/120 dated July 11, 2023	The same has not been submitted separately in XBRL Mode.	Submitted in PDF format within stipulated time to the Stock Exchange and also submitted the same separately in XBRL Mode based on the email dated June 05, 2024 of the Stock Exchange.	None
7	The Company has made delay in submission of Annual Report due to submission of same in the wrong head. However, the Company has rectified the same.	2024-25	Regulation 34 of the SEBI (LODR) Regulations, 2015.	The said submission was submitted in the wrong head.	The said submission was submitted in the wrong head inadvertently. The same has been rectified.	None
8	The Company has not intimated Appointment and Resignation of Directors as required under Regulation 30 of the SEBI (LODR) Regulations, 2015 in XBRL Mode to the Stock Exchange.	2024-25	Regulation 30 of the SEBI (LODR) Regulations, 2015.	The said intimation was not intimated to the Stock Exchange.	Submitted in PDF format within stipulated time to the Stock Exchange as required. Further assured that, henceforth it shall also file the same in XBRL format.	None





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9	The Company has not intimated Appointment of Chief Financial Officer as required under Regulation 30 of the SEBI (LODR) Regulations, 2015 in XBRL Mode to the Stock Exchange.	2024-25	Regulation 30 of the SEBI (LODR) Regulations, 2015.	The said intimation was not intimated to the Stock Exchange.	Submitted in PDF format within stipulated time to the Stock Exchange as required. Further assured that henceforth it shall also file the same in XBRL format.	None
10	The Company has not published Financial Result in Newspaper for the quarter ended June 30, 2024 as required under Regulation 47 of the SEBI (LODR) Regulations, 2015.	2024-25	Regulation 47 of the SEBI (LODR) Regulations, 2015.	Non publication of Financial Result in Newspaper for the quarter ended June 30, 2024.	The Company has published the Financial Results for all other quarters and all the financial results are available on website of the Stock Exchange and Company. It was not intentional rather it was circumstantial. In future Company will take extra precaution.	None
11	The Company has not published General Public Notices in Newspaper in respect to the EGM dated May 07, 2024 and AGM dated August 30, 2024 as required under Regulation 30 and 47 of the SEBI (LODR) Regulations, 2015.	2024-25	Regulation 30 and 47 of the SEBI (LODR) Regulations, 2015.	Non publication of Notices in Newspaper in respect to the EGM dated May 07, 2024 and AGM dated August 30, 2024.	The Company has provided necessary notices to the Stock Exchange and Shareholders. It was not intentional rather it was circumstantial. In future Company will take extra precaution.	None

(c) We 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 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: i. All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Listed Entity. ii. 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 Website: i. The Listed Entity is maintaining a functional website. ii. Timely dissemination of the documents/information under a separate section on the website. iii. 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	-





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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	-
5	Details related to Subsidiaries of Listed Entity have been examined w.r.t.: (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	NA	Listed Entity does not have 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 the 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	-
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	-
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 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 except as provided under separate paragraph hereinabove (a).	Yes	-
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 Entity.	NA	There was no such instance
13	Additional non-compliances, if any: No additional non-compliance observed for any SEBI Regulation/circular/guidance note etc. except as reported above.	Yes	-





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We further, report that the disclosure requirements of Employee Benefit Scheme Documents in terms of the provisions of Regulation 46(2)(za) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 is not applicable to the Listed Entity.

Assumptions & Limitation of Scope and Review:

1. Compliance of the applicable laws, rules, regulations, guidelines and standards and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the Listed Entity.
2. Maintain records and establish appropriate systems for ensuring compliance with applicable SEBI Regulations, Circulars, and Guidelines issued from time to time and to ensure the adequacy and operational effectiveness of such systems are the responsibilities of the management of the Listed Entity.
3. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
4. We have not verified the correctness and appropriateness of financial records and books of accounts of the Listed Entity.
5. Wherever required, we have obtained the management representation about the compliance of laws, rules, regulations and guidelines and happening of events etc.
6. This Report is solely for the intended purpose of compliance in terms of the provisions 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 ALPESH VEKARIYA & ASSOCIATES
COMPANY SECRETARIES


ALPESH VEKARIYA
FCS: 11100
COP: 21541



UDIN: F011100H000532610
PRC: 1799/2022
FRN: S2018GJ652400
Place: Ahmedabad
Date: May 29, 2026