



**C & C CONSTRUCTIONS LIMITED**  
Communication Address :- Plot No. 70, Institutional Sector-32, Gurgaon-122001 (Haryana)  
Phone.: 0124-4236868  
Website : [www.candcinfrastructure.com](http://www.candcinfrastructure.com)

**Date: 29-05-2025**

To, The General Manager, Department of Corporate Services, BSE Limited Phiroze Jeejeebhoy Towers Dalal Street, Mumbai- 400001 <b>Scrip Code: 532813</b> <b>ISIN: INE874H01015</b>	To, Manager-Listing Compliance, National Stock Exchange of India Limited, Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra East, Mumbai – 400051 <b>Symbol: CANDC</b> <b>ISIN: INE874H01015</b>
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**Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2025.**

**Dear Sir/Madam,**

Pursuant to the Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Master Circular SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024, please find enclosed herewith the Annual Secretarial Compliance Report of the Company issued by Deepti & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2025.

The afore-mentioned report is also available on the website of the Company at [www.candcinfrastructure.com](http://www.candcinfrastructure.com)

We request you to please take the above on record.

Thanking you,

Yours faithfully,

**For C & C Constructions Limited**

**Chandan Singh**  
**Whole Time Director**  
**DIN: 10901481**

# Deepti & Associates

Company Secretary & Legal Consultant

## Secretarial Compliance Report of C & C Constructions Limited for the year ended March 31, 2025

We, **Deepti & Associates, Practicing Company Secretaries**, have examined:

- (a) all the documents and records made available to us and explanation provided by C & C Constructions Limited ("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 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");

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 (Buyback of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) (other regulations as applicable) and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby certify 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	Management Response	Remarks
1.	Filing of quarterly financial results and news paper publication	Reg. 33 & 47 of SEBI (LODR)	Quarterly reporting of financial statements not complied during the quarter ended June 2024 and September 2024	-	-	-	-	During the period from April 1, 2024 to December 27, 2024, the Company was undergoing Liquidation Process and quarterly financial results for the quarter ended June 2024 and September 2024.  However, after the Reconstituted Board of Directors have taken over w.e.f., December 27, 2024, the quarterly results for the quarter ended December 31, 2024 was duly prepared and filed with Stock Exchanges and for the quarter ended March 31, 2025, were duly prepared as on the date of this Report and management represented to file the requisite quarterly filings promptly for the quarter ended March 31, 2025..	With effect from taking control over the Company, the reconstituted board of directors have put necessary internal controls in place to ensure that compliances w.e.f. December 27, 2024, are taken care of.	-
2.	Board and Committee Composition and other related compliances	Reg. 17 to 21 of SEBI (LODR)	No record of any Board / Committee meetings during the period from April 1, 2024 to December 27, 2024.	-	-	-	-	The Company was under Liquidation Process during the period from April 2024 to December 27, 2024. However, after the sale of the company as a going concern under IBC the w.e.f. December 27, 2024, the reconstituted Board of Directors have ensured that all necessary compliances are in place.	With effect from taking control over the Company, the reconstituted board of directors have put necessary internal controls in place to ensure that compliances w.e.f. December 27, 2024, are taken care of.	-
3.	Compliance Officer	Reg. 6 of SEBI (LODR)	No record of appointment of a qualified CS as compliance officer.	-	-	-	-	The liquidator appointed by NCLT was acting as compliance officer till December 27, 2024. Subsequently, the reconstituted Board had appointed a compliance officer within three months from sale of the Company as a going concern.	With effect from taking control over the Company, the reconstituted board of directors have put necessary internal controls in place to ensure that compliances w.e.f. December 27, 2024, are taken care of. Accordingly, a qualified company secretary was appointed and	-





									nominated as Compliance Officer.	
4.	Secretarial Compliance Report	Reg. 24A of SEBI (LODR)	No record of filing of Secretarial Compliance Report for the FY 2024	-	-	-	-	Annual Secretarial Compliance Report was not filed with the Stock Exchanges for the FY 2024. There is no filing of corporate announcement for appointment of a practicing company secretary for FY 2024.	Since it pertains to period prior to taking control over the Company the Management is not in a position to comment on this. However, with effect from taking control over the Company, the reconstituted board of directors have put necessary internal controls in place to ensure that compliances w.e.f. December 27, 2024, are taken care of. Accordingly, a practicing company secretary was appointed by the reconstituted board for performing secretarial audit as well as providing Annual Secretarial Compliance Report.	-
5.	Structured Digital Database ("SDD")	Reg. 3(5) & (6) of SEBI (PIT)	SDD not put in place	-	-	-	-	The Company has invited quotations and as on March 31, 2025, the Company was in the process of setting-up SDD.	After taking over control over the Company, the reconstituted board had put in place all efforts to identify key areas of non-compliances and start addressing the same on priority. As regards SDD, the management invited quotations from the market for setting-up a cost effective SDD model. With all efforts of revival put in place in all respects to revise the stressed company there was a slight delay in finalizing the quotation. However, we are in the process of setting-up the SDD.	-

**Note:**

*It may be noted that M/s C & C Constructions Limited had been ordered to be liquidated by the Hon'ble National Company Law Tribunal, Principal Bench, New Delhi ("NCLT") vide order dated October 07, 2022. Mr. Navneet Kumar Gupta was appointed as the Liquidator of the Company, and Minerva Resolutions LLP was appointed as the Insolvency Professional Entity ("IPE") to assist him in the successful liquidation of the Company in accordance*



with the provisions of the Insolvency and Bankruptcy Code, 2016 ("Insolvency Code").

Subsequently, the sale of the Company as a going concern was executed via E-Auction under the provisions of the Insolvency Code and the IBBI (Liquidation Process) Regulations, 2016. The ownership was transferred to M/s RKC Constructions ("Successful Bidder") through a sale certificate issued by the Liquidator on December 27, 2024. Therefore, for the period from April 01, 2024, to December 27, 2024, the Company was undergoing liquidation process.

Furthermore, the Board of the Company has been reconstituted by the liquidator as per the nomination received from Successful Bidder and the same was duly informed to the Stock Exchanges.

With effect from December 28, 2024, the Reconstituted Board has been taking all necessary steps to regularly comply with the applicable provisions of the SEBI Regulations, as applicable to it.

(b) The listed entity has taken the following actions to comply with the observations made in previous reports: N.A. (No such Annual Secretarial Compliance Report was filed with the Stock Exchanges by the Liquidator)

(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.	<u>Secretarial Standards:</u>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	No	Refer the note (i) below
2.	<u>Adoption and timely updation of the Policies:</u>  • 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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.	Yes	-
3.	<u>Maintenance and disclosures on Website:</u>  • 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	-
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	-
5.	<u>Details related to Subsidiaries of listed entities:</u>  (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	The Listed Entity does not have any subsidiaries





6.	<u>Preservation of Documents:</u> 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 LODR Regulations.	No	Refer the note (ii) below
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	-
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee.	Yes  NA	-  No such instances observed
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of the LODR Regulations within the time limits prescribed thereunder.	Yes	-
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	Refer note (iii) below
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u>  No actions 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 (or)  The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Yes	-
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries</u>  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 instances observed
13.	<u>No additional non-compliances observed:</u> No additional non-compliance observed for any of the SEBI regulation/circular/guidance note etc. except as reported above.	Yes	-



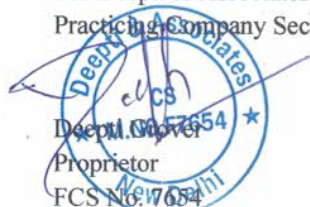
Note:

- i) For the period from April 1, 2024, to December 27, 2024, the Company was under liquidation process and no record could be found with respect to convening meetings of the Board / Committees or other compliances under the Secretarial Standards. However, it is pertinent to note that as per Section 33(7) of the Insolvency Code, *"The order for liquidation under this section shall be deemed to be a notice of discharge to the officers, employees and workmen of the corporate debtor, except when the business of the corporate debtor is continued during the liquidation process by the liquidator."* Since the handover of documentation from Liquidation to the reconstituted board of directors is still ongoing, the necessary documentation on whether business was continued or not during the liquidation process is not known.

However, for the period after December 27, 2024, when the board was reconstituted, all necessary compliances under the Secretarial Standards were duly complied.

- ii) The handover of documentation from Liquidation to the reconstituted board of directors is still ongoing and hence the compliance of the policy on preservation of documents and archival policy is not ascertainable. However, for the period after December 27, 2024, when the board was reconstituted, all necessary compliances under the policy on preservation of documents and archival policy were duly complied.
- iii) The Company has invited quotations and as on March 31, 2025, the Company is in the process of setting-up Structured Digital Database.

For Deepti & Associates  
Practicing Company Secretaries



Deepti Guleri  
Proprietor  
FCS No. 7654

COP No. 17546

FRN: S2016DE438900

UDIN: **F007654G000490774**

Date: New Delhi

Place: 29<sup>th</sup> May, 2025