



# Twamev Construction and Infrastructure Limited

(Formerly known as Tantia Constructions Limited)

## Registered Office

DD-30, 7th Floor, Sector-1  
Salt Lake City, Kolkata - 700064  
+91 33 49505600  
info@twamevcons.com

Date: 30.05.2026

**The Secretary**  
**BSE Limited**  
New Trading Wing,  
Rotunda Building,  
PJ Tower, Dalal Street,  
Mumbai – 400001  
Scrip code – 532738

**The Manager**  
**National Stock Exchange of India Limited**  
Exchange Plaza, C-1, Block “G”  
5<sup>th</sup> Floor, Bandra Kurla Complex,  
Bandra East,  
Mumbai – 400051  
Symbol – TICL

Dear Sir/Madam,

**Subject: Certificate of Secretarial Compliance Report for the Quarter Ended 31<sup>st</sup> March, 2026**

We are enclosing herewith the Secretarial Compliance Report received from the Secretarial Auditor, M/s MR & Associates, pursuant to Regulation 24A of the SEBI (Listing Regulations and Disclosure Requirements) Regulations, 2015, for the year ended 31<sup>st</sup> March, 2026.

We request you to kindly take the same on record.

Thanking you  
Yours Faithfully,

**For Twamev Construction and Infrastructure Limited**  
(*Erstwhile Known as Tantia Constructions Limited*)

Digitally signed by NEHA SARAF  
Date: 2026.05.30 13:57:50 +05'30'

**Neha Saraf**  
Company Secretary  
Mem No. A52479



*Enclosure: As mentioned*

## Corporate Office

Martin Burn Business Park, 17th Floor  
Office No: 1704, Plot 3, Block BP  
Sector V, Saltlake City, Kolkata – 700091  
+91 33 49505600  
info@twamevcons.com

## Delhi Office

5th Floor, Unit No. 517 & 518  
Le-Meridian Commercial Complex  
Raisina Road, New Delhi - 110001  
+91 11 40581302  
delhi@twamevcons.com



# MR & Associates

COMPANY SECRETARIES  
(Peer Reviewed Firm)

46, B. B. Ganguly Street, 406, Kolkata - 700 012  
Tel No: 033 2237 9517 / 4007 7907  
Email : mrosso1996@gmail.com / goenkamohan@gmail.com

SECRETARIAL COMPLIANCE REPORT  
OF  
TWAMEV CONSTRUCTION AND INFRASTRUCTURE LIMITED  
FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2026

[Pursuant to Regulation 24A(2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended]

TO,  
THE MEMBERS,  
TWAMEV CONSTRUCTION AND INFRASTRUCTURE LIMITED  
(formerly known as TANTIA CONSTRUCTIONS LTD.)  
BLOCK DD 30 SECTOR 1 SALT LAKE CITY  
7TH FLOOR KOLKATA - 700064  
WEST BENGAL

We, MR & Associates, a firm of Practicing Company Secretaries, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s TWAMEV CONSTRUCTION AND INFRASTRUCTURE LIMITED (formerly known as TANTIA CONSTRUCTIONS LTD.) (hereinafter called the listed entity) having its Registered Office at Block DD 30 Sector 1 Salt Lake City 7th Floor Kolkata - 700064. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2026, partially complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

We have examined:

- all the documents and records made available to us and explanation provided by M/s. TWAMEV CONSTRUCTION AND INFRASTRUCTURE LIMITED (formerly known as TANTIA CONSTRUCTIONS LTD.) ("the listed entity")
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document / filing, as may be relevant, which has been relied upon to make this report,

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

Corporate  
suv<sub>id</sub>dhā

Website: [www.corporatesuvidha.in](http://www.corporatesuvidha.in)



- (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; - Not Applicable as there was no reportable events during the Financial Year under review.
- (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; -Not Applicable as there was no reportable events during the Financial Year under review;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; -Not Applicable as there was no reportable events during the Financial Year under review;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; -Not Applicable as there was no reportable events during the Financial Year under review;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder, and based on the above examination, we 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 the matters specified below and subject to the observations made elsewhere in this report: As per **Annexure A**
- (b) The listed entity had taken the following actions to comply with the observations made in previous reports: As per **Annexure B**
- (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 of the Practicing Company Secretary
1.	<p><b>Secretarial Standards:</b></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).</p>	Yes	-

2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>	Yes	-
3.	<b>Maintenance and disclosures on Website:</b> 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	The Web-link provided in the corporate governance report filed with the stock exchange during the Audit period contains the link to the home page of the website and does not direct to the specific document, however, subsequently corrected for F.Y. ended March 31, 2026.
4.	<b>Disqualification of Director:</b> None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013.	Yes	We have relied on the declaration made by the directors to the Company and produced before us.
5.	<b>Details related to Subsidiaries of listed entities:</b> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries.	NA	As per the information and explanation provided by the management, the listed entity does not have any material subsidiary company as on Financial Year ended 31.03.2026. However, the Company have two subsidiary / step down subsidiary Companies as on Financial Year ended 31.03.2026.
6.	<b>Preservation of Documents:</b> 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	We have relied upon the management representation and verification on a sample basis.
7.	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year.	Yes	The Company has carried out the performance evaluation of the Board at its meeting held on May 27, 2025

8.	<b>Related Party Transactions:</b> (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	As per the information given by the management, the required approval for Related Party Transactions had been obtained.
9.	<b>Disclosure of events or information:</b> 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	As per the information provided by the management all the material information u/r 30 were intimated to the stock exchange within the specified time period except as provided in Annexure-A.
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	The Company has established general systems for maintenance of its database.
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> 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	As per Annexure A
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries</b> 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 were no such instances of resignation of auditor during the Financial Year 2025-26, however, the terms of appointment of its statutory auditors is yet to be modified as per the Circular.
13.	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for all SEBI regulation/circular/guidance note etc. except as reported above.	Yes	Few revised filings made due to inadvertent omissions and addendums were made during the period under review. As informed by the Management, the same were procedural/technical in nature.

We further, report that the listed entity is not required to be comply with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations – N/A

**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. The compliance of the provisions of corporate and other applicable laws, rules, regulations and standards is the responsibilities of the management and also based on opinions furnished to us by the Company.
4. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity. We have obtained the Management Representation about the compliance of regulations, wherever required. This Report is limited to the Statutory Compliances on laws/ regulations / guidelines listed in our report which have been complied with by the Company up to the date of this Report pertaining to the financial year ended March 31, 2026.
5. 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.
6. The audit was conducted in accordance with the Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India (ICSI), involving such examinations and verifications as deemed necessary and adequate for the purpose.
7. This Report is limited to the Statutory Compliances on laws/ regulations / guidelines listed in our report to the matters arising during the audit period from April 1, 2025 to March 31, 2026.

For MR & Associates  
Company Secretaries  
A Peer Reviewed Firm  
Peer Review Certificate No.: 5598/2024

Place: Kolkata  
Date: 29.05.2026



*Urvi Sanghvi*

[CS Urvi Sanghvi]  
Partner  
ACS No: A60185  
C P No.:25788  
UDIN: A060185H000466327

## Annexure- A

I. (a)The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, subject to the following observations as specified below in addition to the other mentioned points in the report: -

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 (in Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	The listed entity shall publish an advertisement in the newspaper, within forty-eight hours of conclusion of the meeting of board of directors at which the financial results were approved.	Regulation 47(1) of SEBI (LODR) Regulations, 2015	Minor deferment	-	-	Minor delay of 1 (one) day in publication of newspaper advertisements of financial results for the quarters ended March 2025 and December 2025.	-	The newspaper publication of financial results was not made within the prescribed timeline in two instances, viz., a delay of one day for the financial results for the quarter and year ended March 31, 2025, and publication on the next available publication day for the financial results for the quarter ended December 31, 2025 due to intervening weekend days, as represented by the management based on the publisher's confirmation.	The omission occurred inadvertently. The company assures that utmost diligence will be exercised to ensure no such laps occurs in future.	-
2.	Listed entities shall submit Integrated Filing - Financial in XBRL on same date of submission of the financial results (in PDF form)	Regulation 33 of SEBI (LODR) Regulations, 2015 read with SEBI circular SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31.12.2024 and Exchange's notice no:	Time lag in submission of integrated filing due to technical constraints	-	-	Delay in Integrated Filing (XBRL mode) for Quarter ended March 2025 (BSE), June 2025 (NSE) and September 2025 (NSE)	-	The Financial Results in XBRL format for were submitted in the following ways  For Quarter ended March 2025, approved on May 27, 2025, submitted to BSE on May 28, 2025.  For Quarter ended June 2025, approved on August	-	-



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 (in Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
		20250102-4 dated 02.01.2025 and BSE Notice No. 20250402-15 dated 02.04.2025 and NSE Circular No. NSE/CML/2025/20 dated 02.04.2025						12, 2025, submitted to NSE on September 10, 2025.  For Quarter ended September 2025, approved on November 12, 2025, submitted to NSE on November 18, 2025.  Nevertheless, the Consolidated Financial Results were duly submitted in PDF format within the prescribed timeline.		
3.	Where the public shareholding in a listed company falls below twenty-five per cent, as a result of implementation of the resolution plan approved under section 31 of the Insolvency and Bankruptcy Code, 2016 (31 of 2016), such company shall bring the public shareholding to twenty-five per cent within a maximum period of three	Regulation 38 of SEBI LODR Regulations 2015 read with Rule 19(2) and 19A of the Securities Contracts (Regulation) Rules, 1957 and SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/O 155 dated November 11,	Achievement of Minimum public Shareholding of 10% before the due date of April 15, 2025	NSE & BSE	Email Communication, freezing action against promoters and fine imposed	The due date to achieve Minimum Public Shareholding requirement of 10% was April 15, 2025, however the same was proceeded by way of offer for sale carried on during the FY 2025-26.  The Company is in the process of achieving 25% within the	Rs. 390000 /- (plus GST) by NSE and BSE each	The due date to achieve Minimum Public Shareholding requirement of 10% was April 15, 2025, hence NSE vide its email communication dated April 16, 2025 had communicated for freezing action which has been initiated against the Promoters and Promoters Group of the Company on April 16, 2025 as per SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/O155 dated November 11, 2024. The minimum public shareholding was	As the company was out from NCLT, Kolkata Bench, MPS timelines for such companies is as per Regulation 38 of LODR read with Rule 19A(5) of the Securities Contracts (Regulation) Rules, 1957. Henceforth, the MPS of 10%	-



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 (in Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
	years from the date of such fall, in the manner specified by the SEBI: Provided that, if the public shareholding falls below ten per cent, the same shall be increased to at least ten per cent, within a maximum period of twelve months from the date of such fall, in the manner specified by the SEBI.	2024				stipulated time frame prescribed under the Regulation via offer for sale or as the circumstances permit.		proceeded by way of offer for sale carried on during the FY 2025-26 The requisite fine was paid by the Company on July 04, 2025 and July 05, 2025.  The Company is in the process of achieving 25% within the stipulated time frame prescribed under the Regulation via offer for sale or as the circumstances permit.	was duly achieved during the F.Y. 2025-26 as per the rules and regulations. The Offer for Sale is still continuing and the Company shall achieve the MPS of 25% within the prescribed timeline via offer for sale or as the circumstances permit.	
4.	Listed companies shall publicize the opening of Special Window for Transfer and Dematerialisation of Physical Securities once every two months during the one-year period.	SEBI Circular No. HO/38/13/11(2)2026-MIRSD-POD/ I/3750/2026 dated January 30, 2026	Publication in print/social media once every two months during the one-year period, was first made on April 30, 2026.	-	-	Publication in print/social media once every two months during the one-year period, was first made on April 30, 2026.		The Company should ensure timely publication in print/social media at the prescribed intervals in compliance with the applicable regulatory requirements.	The Company shall take utmost care to ensure compliance with the applicable provisions in future and shall take necessary steps to comply with the same.	-



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 (in Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
5.	The listed entity shall first disclose to stock exchange(s) of all events, as specified in Part A of Schedule III, or information as soon as reasonably possible and not later than thirty minutes from the closure of the meeting of the board of directors in which the decision pertaining to the event or information has been taken. All listed entities would be required to submit the filings in XBRL mode within 24 hours of submission of the said PDF filing	Regulation 30 read with Schedule III Part A Clause 7 of SEBI LODR Regulations 2015, read with BSE Circular No. 20230127-37 and NSE Circular No. NSE/CML/2023/11 dated January 27, 2023	Non-intimation of appointment of Senior Management Personnel to the Stock Exchanges pursuant to the Board Meeting held on November 12, 2025, and non-filing of the same in XBRL mode.	-	-	The Company omitted to intimate the Stock Exchanges regarding the appointment of Mr. Biswajit Chakraborty as Senior Management Personnel pursuant to the Board Meeting held on November 12, 2025, within the prescribed timeline and also failed to submit the requisite filing in XBRL mode.	-	The disclosure relating to the appointment of Mr. Biswajit Chakraborty, Senior Management Personnel was not submitted to the Stock Exchanges within the timeline prescribed under Regulation 30 of SEBI (LODR) Regulations, 2015 and the corresponding XBRL filing was also not made. The management has informed that the lapse was inadvertent and has assured necessary compliance going forward.	The omission occurred inadvertently. The company assures that utmost diligence will be exercised to ensure no such laps occurs in future	-
6.	The listed entity shall submit to the stock exchange and publish on its website a copy of the annual report sent to the shareholders along	Regulation 34(1) of SEBI (LODR) Regulations, 2015.	Non-submission of the Annual Report for F.Y. ended March 31, 2025	BSE & NSE	Email communication dated October 30, 2025	Annual Report dispatched to shareholders on September 01, 2025, however, intimated to stock exchange on September 02,	Rs. 2000/- (plus GST) by BSE and NSE each	Fines imposed by BSE and NSE per SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024. The Company has paid the same on October 31, 2025.	The Management explained that the delay occurred due to inadvertent / administrative reasons and	-



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 (in Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
	with the notice of the annual general meeting on or before the commencement of dispatch to its shareholders;		within the prescribed period			2025			assured that necessary internal controls and compliance tracking mechanisms have been strengthened to ensure timely filings in future.	
7.	SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI Circular on Extension of automated implementation of trading window closure to Immediate Relatives of Designated Persons, on account of declaration of financial results.	Regulation 9 of SEBI ("PIT Regulations") - and SEBI Circular No. SEBI/HO/ISD/1 SD-PoD-2/P/CIR/2025/55 dated April 21, 2025	Restriction of trading by immediate relatives of Designated Person by way of freezing of Pan and inclusion in list of Designated Person.	-	-	Names of immediate relatives included lately in the list of Designated Persons for restriction of trading as required	-	The name of immediate relatives of Designated Persons for implementation of trading restriction/PAN freezing mechanism in terms of Regulation 9 of the SEBI PIT Regulations 2015 read with SEBI Circular No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2025/55 dated April 21, 2025 was updated lately.	No Trading is done by any of the immediate relatives of the Designated Person during the Closure of Trading Window, as the Company gives notice of trading window closure. We have also updated the list of immediate relatives in April 2026.	



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 (in Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks

Note: This Annexure forms an integral part of the Secretarial Compliance Report of Twamev Construction and Infrastructure Limited for the financial year ended March 31, 2026.

Place: Kolkata  
Date : 29.05.2026

For MR & Associates  
Company Secretaries  
A Peer Reviewed Firm  
Peer Review Certificate No.: 5598/2024

*Urvi Sanghvi*



[CS Urvi Sanghvi]  
Partner  
ACS No: A60185  
C P No.:25788  
UDIN: A060185H000466327

## Annexure- B

(b) The listed entity had 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	Observations made in the secretarial compliance report for the year ....	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 listed entity has submitted the compliance certificate of the year ended 31.03.2024 without the signature of Compliance Officer of the entity as per Reg 7(3) of SEBI (LODR) Reg, 2015.	31.03.2025	The listed entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent, wherever applicable, within thirty days from the end of the financial year.	Partially complied in the certificate submitted for the year ended 31.03.2024 during the audit period	The Company has strengthened its internal compliance mechanism to avoid recurrence of such instances in future.	The actions taken by the Company have been noted and are considered adequate to avoid recurrence of such delay in future.
2.	The listed entity had published an advertisement of Financial Result for quarter ended 31.12.2024 in the newspaper without containing a Quick Response code as per Reg 47(1) of SEBI (LODR) Reg, 2015.	31.03.2025	The listed entity shall publish an advertisement in the newspaper, within forty-eight hours of conclusion of the meeting of board of directors at which the financial results were approved, containing a Quick Response code and the details of the webpage where complete financial results of the listed entity, as specified in regulation 33.	Partially complied for quarter ended 31.12.2024	The Company has advised the concerned officials to ensure inclusion of Quick Response Code in future newspaper advertisements of financial results.	The Company has assured to ensure compliance with the requirements of Regulation 47(1) of SEBI (LODR) Regulations, 2015 in future.



3.	The Statutory Auditor has expressed a modified opinion(s) or reservation(s), in his report for the quarter ended March, September and December 2024, but the entity has not published the same in the newspaper where the financial results were published.	31.03.2025	The listed entity shall publish the financial results in the newspaper along-with the modified opinion(s) or reservation(s), if any, expressed by the auditor.	Partially complied for the said quarters during F.Y. 2024-25	The Company has strengthened its internal compliance mechanism to avoid recurrence of such instances in future.	The actions taken by the Company have been noted and are considered adequate to avoid recurrence of such default.
4.	The Company has delayed compliance in respect of disclosures related to various tenders/orders received from different sectors of Government departments. The disclosures to the stock exchange, corresponding to submissions dated 26.06.2024, 05.12.2024, 10.12.2024, 01.02.2025, and 05.02.2025, were made beyond the prescribed timeline of 24 hours from the receipt of the respective information/letters.	31.03.2025	The listed entity shall first disclose to stock exchange(s) of all events, as specified in Part A of Schedule III, or information as soon as reasonably possible and not later than twenty-four hours from the occurrence of event or information.	Intimation to the Stock exchange under Regulation 30 made beyond 24 hours and not in the prescribed format.	The Company has advised the concerned officials to ensure timely submission of disclosures to the Stock Exchange(s) in future.	The actions taken by the Company have been noted and are considered adequate to ensure timely and proper compliance with the applicable provisions in future.
5.	The Company partially complied with the use of Digital Signature Certificates (DSC) for authenticating and certifying filings and submissions made to the Stock Exchanges during the financial year 2024-25.	31.03.2025	Circular on use of digital signature certification for authentication / certification of filings / submissions made to Stock Exchanges.	Partial usage of Digital Signature Certificate (DSC) for stock exchange filings during the financial year 2024-25.	The Company has taken necessary steps to ensure use of Digital Signature Certificate (DSC) for authentication/certification of filings and submissions made to the Stock Exchange(s) in compliance with the applicable circulars.	The actions taken by the Company have been noted. The Company is presently complying with the requirements relating to use of DSC for filings/submissions made to the Stock Exchange(s).



6.	Integrated Filing in PDF as per the prescribed format shall be submitted within 24 hrs from the Outcome of the Board meeting. The listed entity has submitted the compliance on 25.03.2025 while the outcome was submitted on 12.02.2025.	31.03.2025	Integrated Filing (Financial) should be filed within 45 days from the end of the quarter, other than the last quarter, and 60 days from the end of the last quarter and the financial year.	Delayed Compliance for Quarter ended 31.12.2024	The omission occurred inadvertently. The company assures that utmost diligence will be exercised to ensure no such lapse occurs in future.	The Company has been taking necessary steps to strengthen its compliance mechanism to avoid lapses in future.
7.	The Company Secretary has resigned w.e.f 30.11.2024 which was intimated to Stock exchange on 09.12.2024 without letter of resignation along with detailed reasons for the resignation. Further the resignation letter was submitted on BSE on 24.01.2025.	31.03.2025	In case of resignation of key managerial the letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel shall be disclosed to the stock exchanges by the listed entities within seven days from the date that such resignation comes into effect.	Intimation to the Stock exchange under Regulation 30 made beyond time.	The Company has advised the concerned officials to ensure timely submission of disclosures to the Stock Exchange(s) in the prescribed format as required under Regulation 30 of SEBI (LODR) Regulations, 2015 in future.	The actions taken by the Company have been noted and are considered adequate to ensure timely and proper compliance with the applicable provisions in future.
8.	The listed entity had a modified opinion in its Annual Audited Consolidated Financial Result for the financial year ended 31st March, 2024 which was disclosed to stock exchange on 29.05.2024 which was not in the prescribed format as per the SEBI Master Circular. Further the same was submitted to NSE on 02.07.2024 after the clarification sought by NSE on 21.06.2024.	31.03.2025	The listed entity while submitting annual audited standalone financial results and annual audited consolidated financial results along with the audit report shall submit Statement on Impact of Audit Qualifications for audit report with modified Opinion in the prescribed format.	Partially Complied	The Company has advised the concerned officials to ensure timely filing of Integrated Filing (Financial) in the prescribed format within the stipulated timeline in future.	The actions taken by the Company have been noted and are considered adequate to ensure timely compliance with the applicable SEBI requirements in future.

9.	The listed entity has not submitted the voting result for the postal ballot held on 28.12.2024 within the prescribed time under Reg 44(3).	31.03.2025	The listed entity shall submit to the stock exchange, within two working days of conclusion of its General Meeting, details regarding the voting results in the format Specified by the Board.	Intimation to the Stock exchange was made beyond time.	The company assures that utmost diligence will be exercised to ensure no such lapse occurs in future.	The Company has been taking necessary steps to strengthen its compliance mechanism to avoid lapses in future.
10.	The listed entity had submitted the Integrated Filing Governance-XBRL on 17.02.2025 in NSE.	31.03.2025	Integrated Filing (Governance) should be filed within 45 days from the end of the quarter.	Delayed Compliance for the quarter ended 31.12.2024.	The omission occurred inadvertently. The company assures that utmost diligence will be exercised to ensure no such lapse occurs in future.	The Company has been taking necessary steps to strengthen its compliance mechanism to avoid lapses in future.
11.	The listed entity initially submitted the explanatory statement without enclosing the requisite certificate from a practicing Chartered Accountant. The said certificate was subsequently submitted on 01.07.2024.	31.03.2025	The listed entity, in the explanatory statement to the notice seeking shareholders' approval for change in name, shall include a certificate from a practicing-chartered accountant stating compliance with conditions provided in sub-regulation.	Delayed Compliance	The omission occurred inadvertently. The company assures that utmost diligence will be exercised to ensure no such lapse occurs in future.	The Company has been taking necessary steps to strengthen its compliance mechanism to avoid lapses in future.
12.	As per Regulation 17(1A) of the SEBI (LODR) Reg, 2015, prior approval of shareholders by way of a special resolution is required for the continuation of directorship of a non-executive	31.03.2025	No listed entity shall appoint a person or continue the directorship of any person as a non-executive director who has attained the age of seventy-five years unless a special resolution	Delayed Compliance & Imposition of Fine - NSE and BSE -Rs. 2,000/- each for June 2024 quarter	The omission occurred inadvertently. The company assures that utmost diligence will be	The Company has been taking necessary steps to strengthen its compliance mechanism to avoid

	director who has attained the age of seventy-five years. In compliance with the said provision, the listed entity passed a special resolution through postal ballot on 05.07.2024 for continuation of Mr. Santanu Ray as a Non-Executive Director, who attained the age of seventy-five years on 29.06.2024.		is passed to that effect, in which case the explanatory statement annexed to the notice for such motion shall indicate the justification for appointing such a person. Provided that the listed entity shall ensure compliance with this sub-regulation at the time of appointment or re-appointment or any time prior to the non-executive director attaining the age of seventy-five years.	NSE and BSE -Rs. 8,000/- each for September 2024 quarter	exercised to ensure no such laps occurs in future.	lapses in future.
13.	The company has not maintained a Minimum Public Shareholding of 25% as specified under Regulation 38 of LODR read with Rule 19A(5) of the Securities Contracts (Regulation) Rules, 1957.	31.03.2025	Where the public shareholding in a listed company falls below twenty-five per cent, as a result of implementation of the resolution plan approved under section 31 of the Insolvency and Bankruptcy Code, 2016 (31 of 2016), such company shall bring the public shareholding to twenty-five per cent within a maximum period of three years from the date of such fall, in the manner specified by the SEBI: Provided that, if the public shareholding falls below ten per cent, the same shall be increased to at least ten per cent, within a maximum period of twelve months from the date of such fall, in the manner specified by the SEBI.	MPS requirement not fulfilled within the specified time.	The Minimum Public Shareholding requirement of 10% was duly achieved during the F.Y. 2025-26 as per the rules and regulations. The Offer for Sale is still continuing and the Company shall achieve the MPS of 25% within the prescribed timeline.	The Company is in the process of achieving 25% within the stipulated time frame prescribed under the Regulation.

Note: This Annexure forms an integral part of the Secretarial Compliance Report of Twamev Construction and Infrastructure Limited for the financial year ended March 31, 2026.

Place: Kolkata  
Date : 29.05.2026

For MR & Associates  
Company Secretaries  
A Peer Reviewed Firm  
Peer Review Certificate No.: 5598/2024



*Urvi Sanghvi*

[CS Urvi Sanghvi]  
Partner  
ACS No: A60185  
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