

Ref: JAL:SEC:2026

22nd May, 2026

BSE Limited

25th Floor, New Trading Ring,
Rotunda Building,
P J Towers, Dalal Street, Fort,
MUMBAI 400 001

The Manager

Listing Department

National Stock Exchange of India Ltd

“Exchange Plaza”, C-1, Block G,
Bandra-Kurla Complex,
Bandra (E), Mumbai - 400 051

SCRIP CODE: 532532

NAME OF SCRIP: JPASSOCIAT

Sub: Annual Secretarial Compliance Report of Jaiprakash Associates Limited for the financial year ended 31st March, 2026

Dear Sirs,

In compliance with Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015, we are forwarding herewith the Annual Secretarial Compliance Report of Jaiprakash Associates Limited for the financial year ended 31st March, 2026 as issued by the Secretarial Auditors of the Company namely VKC & Associates, Company Secretaries.

Kindly take the above Annual Secretarial Compliance Report on your records.

Thanking you.

Yours faithfully,

For JAIPRAKASH ASSOCIATES LIMITED

(SOM NATH GROVER)

Vice President & Company Secretary

FCS-4055

Encl: As above

To,
Mr. Bhuvan Madan,
Chairman-Monitoring Committee
(Erstwhile Resolution Professional),
JAIPRAKASH ASSOCIATES LIMITED
CIN: L14106UP1995PLC019017
Sector 128, Noida, Uttar Pradesh, India, 201304

We have been engaged by JAIPRAKASH ASSOCIATES LIMITED, (hereinafter referred to as 'the Company') bearing CIN: L14106UP1995PLC019017 whose equity shares are listed on National Stock Exchange of India Limited and BSE Limited to conduct a verification in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019 and SEBI's Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated 30th January 2026, for issuing the Annual Secretarial Compliance Report thereon.

MANAGEMENT RESPONSIBILITY:

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

OUR RESPONSIBILITY:

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/guidelines issued there under from time to time and issue a report thereon. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the Listed Company. This is neither an audit nor an expression of opinion.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner, which involved such examinations and verifications as considered necessary and adequate for the said purpose.

DISCLAIMER:

We conducted the audit by examining the secretarial records including minutes, documents, registers, intimation sent to the stock exchanges other records and returns related to the applicable laws on the Company etc. received by the Company. The management has confirmed that the records submitted to us are true and correct. We have also relied upon representation given by the management of the Company.

This Report is solely for the intended purpose of Compliance in terms of Regulation 24A (2) of SEBI Regulations and is neither an assurance as to the future viability of the Listed Entity nor of the efficacy of effectiveness with which the management has conducted the affairs of the Listed Entity.

Annual Secretarial Compliance Report is enclosed.

FOR VKC & ASSOCIATES

(Company Secretaries)

ICSI Unique Code: P2018DE077000

ASHOK TYAGI

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CS Ashok Tyagi

Partner

FCS No.: 2968

C P No.: 7322

UDIN: F002968H000409594

Peer Review Certificate Number: 6406/2025

Date: 19.05.2026

Place: New Delhi

Regd. Office

D-38, LGF (L/S), South Extension Part - II
New Delhi - 110049, India
+91 11 49121644,45, +91 9999233556
pcs@vkcindia.com, www.vkcindia.com

**SECRETARIAL COMPLIANCE REPORT OF JAIPRAKASH ASSOCIATES LIMITED FOR THE
FINANCIAL YEAR ENDED 31.03.2026**

We, M/s. VKC & Associates, Company Secretaries have examined:

- a) all the documents and records made available to us and explanation provided by **JAIPRAKASH ASSOCIATES LIMITED** (“the listed entity”/”Company”),
- b) the filings/ submissions made by the listed entity to the Stock Exchanges,
- c) website of the listed entity,
- d) Management Representation and any other documents/filing, as may be relevant, which has been relied upon to make this Report.

for the year ended 31st March, 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; (“SEBI Regulations”) 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; (“SEBI (LODR), Regulations”)
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable**
- (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**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable**
- (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 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	Remark
1.	Submission of Financial Results: The listed entity shall submit audited standalone and consolidated financial results for the financial year within sixty days from the end of the financial year.	Regulation 33 (3)(d) SEBI (LODR) Regulations	The Company has made a delay in submission of Audited Financial Results (Standalone & Consolidated) for the year ended March 31, 2025.	NSE & BSE	Fine	The financial results were submitted beyond the prescribed timeline.	Total fine imposed of Rs. 1,53,400 (including GST) each by BSE & NSE.	The Company has made a delay in submission of Audited Financial Results (Standalone & Consolidated) for the year ended March 31, 2025.	The delay in finalization/ submission of audited financial results occurred due to engagement of concerned accounts/finance staff in other activities pertaining to the Corporate Insolvency Resolution Process. However, the Company has already paid the fine amount to both the Stock Exchanges	
2.	Submission of Financial Results: The listed entity shall submit un-audited standalone and consolidated financial results for the quarter and half-year within forty-five days from the end of the quarter.	Regulation 33 (3)(a) of SEBI (LODR) Regulations	Delay in the submission of Un-audited Financial Results for the Quarter and Half-year ended September 30, 2025.	NSE & BSE	Fine	The financial results were submitted beyond the prescribed timeline.	Total fine imposed of Rs. 23,600 (including GST) each by BSE & NSE.	Delay in the submission of Un-audited Financial Results for the Quarter and Half-year ended September 30, 2025.	The Unaudited Financial Results for the quarter and half year ended 30 th Sep 2025 could not be reviewed on time due to an urgent meeting of Committee of Creditors scheduled on 14 th Nov 2025. It is informed that the Company has paid fine amount to both the	

									Stock Exchanges.	
3.	Reconciliation of Share Capital: Every listed company shall submit a quarterly Reconciliation of Share Capital Audit Report to reconcile the total admitted capital with the depositories and the total issued and listed capital.	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018.	8,24,598 Equity Shares as on 31.03.2026 are listed on BSE but not in NSE	NSE accorded listing approval for all shares other than the shares held in abeyance due to court cases, complaints etc.	N.A.	N.A.	N.A.	There is a difference of 8,24,598 Equity Shares, which are listed on BSE and pending listing on NSE.	The observation is self-explanatory and does not call any further explanation.	

(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 (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31.03.2025	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.	Regulation 31 of SEBI (LODR) Regulations Holding of specified securities and shareholding pattern.	The Company has made a slight delay in submission of Shareholding Pattern to BSE.	Regulation 31 of SEBI (LODR) Regulations	The Company has made a slight delay in submission of Shareholding Pattern for the September Quarter	The Company had filed fine waiver application before National Stock Exchange of India Limited and BSE Limited explaining the circumstances which led to delay in filing. The National Stock Exchange of India Limited after considering the application of the Company waived the fine as conveyed vide its letter dated 16/01/2025.	As such, no further comments.

					No approval/rejection of waiver application was received from BSE. The Company has paid the fine amount to BSE on 19.05.2026.	
2.	Regulation 47 of SEBI (LODR) Regulations. Submission of Post Newspaper advertisement for AGM to the Stock Exchange.	The Company has made a slight delay in publishing of post newspaper advertisement for AGM to BSE and NSE.	Regulation 47 of SEBI (LODR) Regulations	The Company has made a slight delay in Publishing of post newspaper advertisement for AGM to BSE and NSE.	The Notice of AGM was sent to the shareholders through e-mail on Saturday, the 7 th September 2024 at 23.00 hours. By that time the newspaper offices were closed and they remained closed on 8 th September 2024 (Sunday) too for taking publication orders. On 9 th September 2024, The Company released order for publication of advertisement which was published on 10 th September 2024 and it was sent to BSE and NSE on 10.09.24 itself. The slight delay in publication of advertisement took place due to above reasons which were beyond the control of the Company.	As such, no further comments.
3.	Regulation 55A of SEBI (Depository & Participants) Regulations, 1996	As per the Share Reconciliation Report under Regulation	Regulation 55A of SEBI (Depository & Participants)	8,24,598 Equity Shares as on 31.03.2025 are listed on BSE but not in NSE	As and when the rightful owner(s) claim the shares and the Company provides the	As such, no further comments.

	55A of SEBI (Depository & Participants) Regulations, 1996, there is a difference of 8,24,598 Equity Shares which are not listed on NSE but listed on BSE	Regulations, 1996		dispatch proof of the listing approval for the shares held in abeyance is applied and the same is provided by NSE from time to time.	
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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 of India (ICSI)	N.A.	It has been observed that the company is under CIRP vide order dated 3 rd June, 2024 of Hon'ble NCLT, Allahabad and after that powers of the Board are suspended and are being exercised by the Resolution Professional, Therefore, no meeting of Board of Directors has been convened during the period. *Refer Note No. 1 & 2.
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 (LODR), Regulations and has been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	Yes	N.A
3.	Maintenance and disclosures on 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 redirects to the relevant document(s)/ section of the website 	Yes	N.A
4.	Disqualification of Director(s): None of the Director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	*Refer note No. 1 & 2

5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	N.A.
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI (LODR), Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI (LODR), Regulations.	Yes	N.A
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 (LODR), Regulations	Yes	*Refer note No. 1 & 2
8.	Related Party Transactions: (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	(a) Yes (b) N.A.	*Refer note No. 1 & 2
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 within the time limits prescribed thereunder.	Yes	Subject to as stated hereinabove.
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	N.A.
11.	Actions taken by SEBI or Stock Exchange(s), if any: No Actions(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 (LODR), Regulations and circulars/ guidelines issued thereunder	Yes	Subject to as stated hereinabove.
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 SEBI (LODR), Regulations by listed entities.	N.A	No case of resignation of statutory auditors from the listed entity during the review period.
13.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc. except as reported above.	N.A	Except Table (a), No additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.

14	<p>Compliance with the disclosure requirements of Employee Benefit Scheme The listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of Regulation 46(2) (za) of the SEBI Regulations.</p>	N.A.	As informed by the management, the Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 under reference are applicable to the Trusts incorporated pursuant to these Regulations and do not cover Trusts incorporated prior to the Regulations coming into force. No retrospective applicability of the Regulations.
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Note 1: Please be informed that Corporate Insolvency Resolution Process (CIRP) of the Corporate Debtor/Company has been commenced on 03.06.2024 vide an order of Hon'ble National Company Law Tribunal ('NCLT'), Allahabad Bench regarding admission of the petition of ICICI Bank Limited under Section 7 of the Insolvency and Bankruptcy Code (IBC), 2016.

Further, the Hon'ble National Company Law Tribunal (NCLT), Allahabad Bench, has pronounced an order today i.e. March 17, 2026 ("NCLT Approval"), inter alia, approving the resolution plan dated October 14, 2025 (read with email clarifications dated November 5, 2025) submitted by Adani Enterprises Limited ("Successful Resolution Applicant").

Aggrieved by the aforesaid order, Vedanta Group, which had submitted a competing bid, preferred an appeal before the Hon'ble National Company Law Appellate Tribunal ("NCLAT") challenging the approval of Adani Enterprises Limited's Resolution Plan.

Thereafter, vide order dated 4 May 2026, the Hon'ble NCLAT dismissed/rejected the challenge raised by Vedanta Group against the successful Resolution Plan of Adani Enterprises Limited.

Note 2: Please be informed that since the Company is under CIRP. Therefore, as per Regulation 15(2A) & (2B) of the SEBI (LODR) Regulations, 2015 the provisions related to Regulation 17 to 21 are not applicable on the Company.

FOR VKC & ASSOCIATES

(Company Secretaries)

ICSI Unique Code: P2018DE077000

ASHOK TYAGI
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CS Ashok Tyagi

Partner

FCS No. F2968

C P No. 7322

UDIN: F002968H000409594

Peer Review Certificate Number: 6406/2025

Date: 19.05.2026

Place: New Delhi