

May 29, 2026

To
The Manager
Listing Department
BSE Limited
P. J. Towers, 1st Floor
Dalal Street
Mumbai – 400 001

Scrip Code in BSE: 538833

Sub: Annual Secretarial Compliance Report for the financial year ended March 31, 2026

Dear Sir/Madam

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended 31st March, 2026 issued by M/s. Hemant Sharma & Associates, Practicing Company Secretaries.

This is for your information and records.

Thanking you,

Yours faithfully,

For Kaizen Agro Infrabuild Limited

Ankur Hada
(Managing Director)
Din:- 10163731

Encl: As Above

Secretarial Compliance Report of
KAIZEN AGRO INFRABUILD LIMITED
(Formerly Known as “Anubhav Infrastructure Limited”)
For the Financial Year ended March 31, 2026

I, Mr. Hemant Sharma, Proprietor of M/s. Hemant Sharma & Associates, Company Secretaries in Practice, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **KAIZEN AGRO INFRABUILD LIMITED**, having CIN: L47219WB2006PLC107433 (hereinafter referred as ‘**the listed entity**’) and having its Registered Office at 16/1A, Abdul Hamid Street, 6th Floor, Room No. 6C, Balaji Towers, Esplanade, Kolkata - 700069, West Bengal. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my 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 (‘**Review Period**’), complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I have examined:

- (a) all the documents and records made available to us and explanation provided by **KAIZEN AGRO INFRABUILD 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 Report

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

- (i) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- (ii) 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; **(Not applicable during the review period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable during the review period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable during the review period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable during the review period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other regulations as applicable 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	Management Response	Re- marks
1.	The Company has taken action as per SEBI (LODR) Regulation, 2015	As per the SEBI SOP Circular	There is no such deviation	BSE	NA	Non- Compliance of Regulation 23(9) under SEBI (LODR) Regulation, 2015	11,800	NA	The Company and his Management take the action	Fine paid by Company
2.	The Company has taken action as per SEBI (LODR) Regulation, 2015	As per the SEBI SOP Circular	There is no such deviation.	BSE	NA	Non- Compliance of Regulation 24A under SEBI (LODR) Regulation, 2015	7,080	NA	The Company and his Management take the action	Fine paid by Company

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

Sr. No.	Compliance Requirement (Regulations/ circulars/ guide-lines 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
NONE										

We hereby further report that, during the Review Period the compliance status of the listed entity is appended as below:

Sl. No.	Particulars	Compliance Status (Yes/No/ N.A.)	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	None
2.	Adoption and timely updation of the Policies: 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	None
3.	Maintenance and disclosures on Website: 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	None

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	None
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: Identification of material subsidiary companies Disclosure requirement of material as well as other subsidiaries	NA	The Company does not have any material 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 SEBI LODR Regulations, 2015.	Yes	None
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	None
8.	Related Party Transactions: The listed entity has obtained prior approval of Audit Committee for all related party transactions.	Yes	None
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	None
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	None

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 herein (**).	N.A.	1. Bombay Stock Exchange (BSE) imposed a Fine of Rs. 11,800 for Non-Compliance under Reg 23(9) of SEBI (LODR) Regulation, 2015 and the Fine has been paid by the Company. 2. Bombay Stock Exchange (BSE) imposed a Fine of Rs. 7,080 for Non-Compliance under Reg 24A of SEBI (LODR) Regulation, 2015 and the Fine has been paid by the Company.
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: There was no instance of resignation of Statutory Auditor during the review period.	N.A.	None
13.	Additional non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	N.A.	None

We hereby further report that the following events occurred during the Review Period which are appended as below:

(a) Ref : Our intimation dated 18th June, 2025 informing the receipt of request from members of 'Promoters/ Promoter Group' seeking reclassification of their shareholding to 'Public' category:

Pursuant to the provisions of Regulations 30 and 31A (8) of the Listing Regulations, we wish to inform you that the Board, at its meeting held today i.e. 23rd June, 2025, has inter-alia considered and approved the respective request letters received from Pallavi Agarwal, Santosh Devi Agarwal, Nitu Kanodia, Naresh Kumar Agarwal and Dinesh Agarwal, persons belonging to the promoter and promoter group of the Company, seeking reclassification from the 'promoter and promoter group' category to 'public' category shareholder in accordance with Regulation 31A of the Listing Regulations, from the stock exchanges where the Equity Shares of the Company are listed i.e., BSE Limited.

We further, report that 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 LODR Regulations: Not Applicable

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 certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
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 Hemant Sharma & Associates
Company Secretaries*

**HEMANT
SHARMA** Digitally signed by
HEMANT SHARMA
Date: 2026.05.28
18:23:55 +05'30'

Hemant Sharma

Proprietor

Membership No.: A-42264

COP No.: 17411

Peer Review Certificate No.: 4030 of 2023

UDIN: A042264H000522436

Date : 28-05-2026

Place: Kolkata