DIAMOND POWER INFRASTRUCTURE LIMITED

30th May, 2026

Corporate Relations Department
BSE Limited
2nd Floor, P.J. Towers
Dalal Street,
Mumbai – 400 001
Scrip Code: 522163

Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Plot No. C/1, G- Block,
Bandra Kurla Complex, Bandra (E),
Mumbai – 400 051
NSE: DIACABS

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

Dear Sir/Madam,

Please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended March 31, 2026, issued by M/s. Ashish Shah & Associates, Ahmedabad.

We request you to please take the same on record.

Thanking you,

Yours sincerely,
For Diamond Power Infrastructure Limited

Diksha Sharma
Digitally signed by Diksha Sharma
Date: 2026.05.30 16:25:14 +05'30'

Diksha Sharma
Company Secretary

ASHISH SHAH & ASSOCIATES
Company Secretaries & Trade Mark Agent | Insolvency Resolution Professional
402, "Shaival Plaza", 4" Floor, Gujarat College Road, Besides Hope Hospital, Ellisbridge, Ahmedabad - 380 006.
Mobile : 098259 40391 | Tel. : 079-26420336 / 7 / 9 | E-mail : ashish@ravics.com

Secretarial Compliance Report of DIAMOND POWER INFRASTRUCTURE LIMITED for the financial year ended 31st March 2026

I, Ashish Shah has examined:

(a) all the documents and records made available to us and explanation provided by **DIAMOND POWER INFRASTRUCTURE 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 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; 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; **during the review period the said regulations were not applicable to the listed entity.**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **during the review period the said regulations were not applicable to the listed entity.**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **during the review period the said regulations were not applicable to the listed entity.**

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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Company Secretaries

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(h) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993;

(i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **during the review period the said regulations were not applicable to the listed entity.**

(j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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)	Regu-lation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory / Clarification/ Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Regulation 38 of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 ("SEBI LODR Regulations") The listed entity shall comply with the minimum public shareholding requirements specified in Rule 19(2) and Rule 19A of the Securities Contracts (Regulation) Rules, 1957 in the manner as specified by the Board from time to time	Regulation 38 of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 ("SEBI LODR	The Company has failed to achieve minimum public shareholding norms with the prescribed period of three years from the date of implementation of Resolution Plan i.e. 16.09.2025	BSE Limited and National Stock Exchange of India Limited	Letter	Refer observation of Practicing Company Secretary	-	Non-compliance with the Minimum Public Shareholding (MPS) Requirements	The Letter of non-compliance was placed before the Board for its necessary action. Further, the Board in its meeting held on Monday, November 10, 2025 has approved the proposal for raising funds by	-

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		Regulations")							issuance of Eligible Securities through Qualified Institutions Placement ("QIP") to Qualified Institutional Buyers ("QIBs") in one or more tranches, through such mode as may be deemed appropriate and permitted under applicable laws, including the Companies Act, 2013, read with the rules framed thereunder, and the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, subject to approval of the Shareholders through Postal Ballot (by remote e-	

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									voting only) and receipt of all requisite regulatory /statutory approvals up to ₹1,000 Crores. The Board further decided that the Company shall endeavour to achieve full compliance with the Minimum Public Shareholding requirements at the earliest. Also, the Company has taken the approval of shareholders through postal ballot on 17.12.2025 for QIP.	

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2.	Regulation 38 of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 ("SEBI LODR Regulations") The listed entity shall comply with the minimum public shareholding requirements specified in Rule 19(2) and Rule 19A of the Securities Contracts (Regulation) Rules, 1957 in the manner as specified by the Board from time to time	Regulation 38 of SEBI LODR Regulations	Non-compliance with the Minimum Public Shareholding (MPS) Requirements	BSE Limited and National Stock Exchange of India Limited	Fine	Non-compliance with the Minimum Public Shareholding (MPS) Requirements	Fine Amount of Rs. 1,40,000/- plus GST is paid by the Company with both the stock exchange(s).	The Company has failed to achieve minimum public shareholding norms with the prescribed period of three years from the date of implementation of Resolution Plan i.e. 16.09.2025. Accordingly, both the stock exchange(s) i.e. BSE Limited and National Stock Exchange of India Limited had issued notices to levy fine for a period of 14 days from 17.09.2025 to 30.09.2025 and levied fine of Rs. 1,40,000/- plus GST and the Company has paid such fine with both the Stock Exchanges.	The Company has paid necessary fine of Rs. 1,40,000/- plus GST with both the Stock Exchanges and informed the Stock Exchange (s) that the Board of Directors in its meeting held on Monday, November 10, 2025 has approved the proposal for raising funds by issuance of Eligible Securities through Qualified Institutions Placement ("QIP") to Qualified Institutional Buyers ("QIBs") in one or more tranches, through such mode as may be deemed appropriate and permitted under applicable laws, including	Nil

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									the Companies Act, 2013, read with the rules framed thereunder, and the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, subject to approval of the Shareholders through Postal Ballot (by remote e-voting only) and receipt of all requisite regulatory /statutory approvals up to ₹1,000 Crores. The Board further decided that the Company shall endeavor to achieve full compliance with the Minimum Public Shareholding requirements at the	

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									earliest. Also, the Company has taken the approval of shareholders through postal ballot on 17.12.2025 for QIP.	
3.	Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 ("SEBI LODR Regulations")	Reg. 24A of SEBI LODR Regulations	Cautionary mail for observation(s) reported by Secretarial Auditor in Secretarial Compliance Report submitted for FY ended March 2025.	National Stock Exchange of India Limited	Cautionary mail for observation(s) reported by Secretarial Auditor in Secretarial Compliance Report submitted for FY ended March 2025.	Observations mentioned by Secretarial Auditor in his Secretarial Compliance Report submitted for the FY ended March 2025.	Nil	The Company has placed before their Board of Directors this warning letter and also ensured to take corrective measures to avoid such lapses	The Company will take necessary corrective steps and exercise due caution to avoid recurrence of such lapses in future and ensure compliance with SEBI LODR Regulations.	Nil
4.	Regulation 38 of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 ("SEBI LODR Regulations") The listed entity shall comply with the minimum public	Regulation 38 of SEBI LODR Regulations	Non-compliance with the Minimum Public Shareholding (MPS) Requirements	BSE Limited and National Stock Exchange of India Limited	Fine	Non-compliance with the Minimum Public Shareholding (MPS) Requirements	Fine Amount of Rs. 9,20,000 /- plus GST is paid by the Company with both the stock exchange (s).	The Company has failed to achieve minimum public shareholding norms with the prescribed period of three years from the date of implementation of	The Company has paid necessary fine of Rs. 9,20,000/- plus GST with both the Stock Exchanges. Further the Board of Directors of the	Nil

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	shareholding requirements specified in Rule 19(2) and Rule 19A of the Securities Contracts (Regulation) Rules, 1957 in the manner as specified by the Board from time to time:							Resolution Plan i.e. 16.09.2025. Accordingly, both the stock exchange(s) i.e. BSE Limited and National Stock Exchange of India Limited had issued notices to levy fine for a period of 92 days from 01.10.2025 to 31.12.2025 and levied fine of Rs. 9,20,000/- plus GST and the Company has paid such fine with both the Stock Exchanges.	Company at it's meeting held on 14.02.2026, committed that the Company shall endeavor to achieve full compliance with the Minimum Public Shareholding requirements at the earliest.	
5.	Regulation 38 of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 ("SEBI LODR Regulations") The listed entity shall comply with the minimum public shareholding requirements specified in Rule 19(2) and Rule 19A of the Securities Contracts (Regulation) Rules, 1957 in the manner as specified by the Board from time to time:	Regulation 38 of SEBI LODR Regulations	Non-compliance with the Minimum Public Shareholding (MPS) Requirements	BSE Limited and National Stock Exchange of India Limited	Fine	Non-compliance with the Minimum Public Shareholding (MPS) Requirements	Fine Amount of Rs. 9,00,000 /- plus GST is paid by the Company with both the stock exchange (s).	The Company has failed to achieve minimum public shareholding norms with the prescribed period of three years from the date of implementation of Resolution Plan i.e. 16.09.2025. Accordingly, both the stock exchange(s) i.e. BSE Limited and National Stock Exchange of India Limited had issued notices to levy fine for a period of 90 days from 01.01.2026 to	The Company has paid necessary fine of Rs. 9,00,000/- plus GST with both the Stock Exchanges. Further the Board of Directors of the Company at it's meeting held on 26.05.2026. The Board is committed to ensuring compliance with the Minimum Public Shareholding requirements at the earliest.	Nil

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								31.03.2026 and levied fine of Rs. 9,00,000/- plus GST and the Company has paid such fine with both the Stock Exchanges.		

(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 in the previous reports	Observations made in the secretarial compliance report for the year ended on 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.	Nil	The Company has reduced its Equity Share Capital by 99% and allotted fresh shares as per the approved Resolution Plan. The Company is currently under process to comply with Regulation 38 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 of minimum public shareholding. The Company has to achieve the	In pursuance of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 and Securities Contracts (Regulation) Rules, 1957, 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 Securities and Exchange Board of India.	The Company was under Non Compliance of Regulation 38 of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.	As per the terms of Resolution Plan duly approved by the National Company Law Tribunal, Ahmedabad Bench, due to long time taken in initial reduction of the Share Capital & Listing thereof and then filing a further application for listing of Promoters shares, it is not possible for the Company to Comply with	The Company has paid necessary fine with both the stock exchanges and submitted Waiver applications with both the Stock exchanges and the said applications was rejected by the stock exchanges on 28.11. 2024.

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		minimum public shareholding from 10% to 25% till 16.09.2025.			the Regulations 38 of the SEB) (LODR), 2015 in respect of achieving the Minimum Public Shareholding. The Company was of the view that the period of 12 months applicable for 10% MPS should start from 29.01.2024, a date where the shares of the Promoters are listed and considered for trading on the platform of the stock exchanges. In view of the same, the said period of 12 months will end on 29.01.2025	
2.	Nil	The Company has not complied with Regulation 4(1)(e) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015.	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015.	The Listed Entity shall ensure that disseminations are adequate, accurate, explicit, timely and presented in a simple language.	The Company will take necessary corrective steps and exercise due care to avoid recurrence of such lapses in future and ensure compliance with SEBI Listing Regulations.	The Company has ensured future compliance in this matter.

(c) I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

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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:** • 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 Yes	- -
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 Yes Yes	- - -
4.	**Disqualification of Director:** None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013	Yes	-

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5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	 Yes Yes	 - -
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 Documentsand Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	-
7.	**Performance Evaluation:** The listed entity has conducted performance evaluationof 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 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	-

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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 underseparate paragraph herein (**).	No	Action has been taken by both the Stock Exchange(s) i.e. BSE Limited and National Stock Exchange of India for leaving fine in the matter of non-compliance of Regulation 38 of SEBI LODR Regulations i.e. failed to achieve Minimum Public Shareholding norms within the prescribed period of three years from the date of implementation of Resolution Plan i.e. 16.09.2025. The details are mentioned above at point no. (a) of this report. -
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 entities.	N.A.	During the year there is no resignation of Statutory Auditors therefore it is mentioned as not applicable.

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13.	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBIregulation/circular/guidance note etc.	Yes	-

*Observations /Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

Place: Ahmedabad

Date: 30.05.2026

For, Ashish Shah & Associates

Company Secretaries

Ashish Shah & Associates
COP No. 4178
Company Secretaries

Signature:
Ashish Shah
Proprietor
Mem. No. FCS: 5974
CP No.: 4178
UDIN: _F005974H000554126
PR. No. S2001GJ041700