

POSTAL BALLOT NOTICE

[Notice pursuant to Section 108 and Section 110 of the Companies Act, 2013 read with Rule 20 and Rule 22 of the Companies (Management and Administration) Rules, 2014]

Dear Member(s),

Notice is hereby given pursuant to the provisions of Section 108 and Section 110 and other applicable provisions, if any, of the Companies Act, 2013 ('the Act'), read with the Companies (Management and Administration) Rules, 2014 and Secretarial Standard-2 issued by the Institute of Company Secretaries of India (including any statutory modification or re-enactment(s) thereof for the time being in force), read with the General Circular No. 14/2020 dated April 8, 2020, the General Circular No. 17/2020 dated April 13, 2020 and General Circular No. 22/2020 dated June 15, 2020 in relation to "Clarification on passing of ordinary and special resolutions by companies under the Companies Act, 2013 and the rules made thereunder on account of the threat posed by COVID - 19" issued by the Ministry of Corporate Affairs, Government of India ('the MCA Circulars') and pursuant to other applicable laws and regulations, that the resolutions appended below to be passed by the Members of Accuracy Shipping Limited ('the Company') by way of Postal Ballot (only through the remote e-voting process).

The Company in compliance with Regulation 44 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Listing Regulations'), Section 108 of the Act read with Rule 20 of the Companies (Management and Administration) Rules, 2014 and is pleased to provide the members with the facility to exercise their right to vote on the matters included in the postal ballot by electronic means i.e. through e-voting services provided by Central Depository Services (India) Limited. **The e-voting will commence on Thursday, September 10, 2020 at 09:00 am (IST) and end on Friday, October 9, 2020 at 05:00 pm (IST).** Please read carefully and follow the instructions as specified in this Postal Ballot Notice for e-voting.

In terms of the MCA Circulars, in view of the current extraordinary circumstances due to COVID-19 pandemic requiring social distancing, companies are advised to take all decisions requiring members' approval, other than items of ordinary business or business where any person has a right to be heard, through the mechanism of postal ballot/e-voting in accordance with the provisions of the Companies Act and rules made thereunder, without holding a general meeting that requires physical presence of members at a common venue. MCA has clarified that for companies that are required to provide e-voting facility under the Companies Act, 2013, while they are transacting any business(s) only by postal ballot upto September 30, 2020 or till further orders, whichever is earlier, the requirements provided in Rule 20 of the Companies (Management and Administration) Rules, 2014 as well as the framework provided in the MCA Circulars will be applicable *mutatis mutandis*. Further, the Company will send Postal Ballot Notice by email to all its shareholders who have registered their email addresses with the Company or depository / depository participants and the communication of assent / dissent of the members will only take place through the remote e-voting system. This Postal Ballot is accordingly being initiated in compliance with the MCA Circulars.

The notice is sent to all members / beneficiaries whose names appear on the Register of Members / Record of Depositories as on **Friday, August 21, 2020 ('Cut-off-date')** and who have registered their email addresses in respect of electronic holdings with the Depository through the concerned Depository Participants.

In compliance with the requirements of the MCA Circulars, the hard copy of Postal Ballot Notice along with Postal Ballot Forms and pre-paid business envelope will not be sent to the members for this Postal Ballot and members are required to communicate their assent or dissent through the remote e-voting system only.

Members are requested to carefully read the instructions in this Postal Ballot Notice and record their assent (FOR) or dissent (AGAINST) through the remote e-voting process **not later than 5:00 pm on Friday, October 9, 2020**. The assent or dissent received after such date and time shall be treated as if voting from the Member has not been received.

The Board of Directors of the Company ('the Board') at its meeting held on Tuesday, 28th July, 2020, had appointed CS Piyush Prajapati, Practicing Company Secretary (ACS No. 50574, C.P. No. 18332), as the Scrutinizer ('Scrutinizer') for conducting the Postal Ballot (e-voting process) in a fair and transparent manner.

The Scrutinizer will submit his report to the Chairman or in his absence to any person, duly authorised by him after completion of the scrutiny and **the results of the voting will be declared not later than 5:00 pm on Saturday, October 10, 2020**. The said results will also be intimated to the National Stock Exchange of India Limited ('NSE') where the Company's securities are listed, and displayed on the website of the Company i.e. <http://www.aslindia.net/> as well as on the website of CDSL at www.evotingindia.com. In the event that the national lockdown on account of COVID-19 situation is eased off and the Company's offices are open for business, the Company will also display the results of the postal ballot at its registered office.

The explanatory statement, as required under Section 102 of the Companies Act 2013, pertaining to the proposed resolutions setting out the material facts and reasons thereof is annexed herewith.

The Resolution, if passed by requisite majority, will be deemed to be passed on the last date specified for e-voting i.e. **Friday, October 9, 2020**. Further, resolution passed by the members through remote e-voting are deemed to have been passed effectively at a general meeting.

SPECIAL BUSINESS:

1. MIGRATION OF THE COMPANY FROM SME PLATFORM OF NATIONAL STOCK EXCHANGE OF INDIA LIMITED TO MAIN BOARD OF NATIONAL STOCK EXCHANGE OF INDIA LIMITED

To consider and, if thought fit, to pass the following resolution as a *Special Resolution*:

Note: *In accordance with Regulation 277 of SEBI (ICDR) Regulations, 2018, the below mentioned resolution shall be acted upon if and only if the votes cast by shareholders, other than promoters, in favour of the proposal amount to at least two times the number of votes cast by shareholders, other than promoter, against the proposal.*

"RESOLVED THAT pursuant to provisions laid down in Chapter IX of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 ('ICDR Regulations'), Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') and other applicable provisions, if any, the Companies Act, 2013 ('the Act') and the rules framed there under, including any amendment, modification, variation or re-enactment thereof, and subject to the approval of National Stock Exchange of India Limited ('NSE'), the consent of the Members of the Company be and is hereby accorded for migration of the Company's present listing from Emerge Platform of NSE to the Main Board of NSE and to follow such procedures specified under ICDR Regulations, as amended from time to time, to give effect to the this resolution;

RESOLVED FURTHER THAT any Director and/or Company Secretary and/or Chief Financial Officer of the Company be and are hereby authorised jointly and/or severally to deal with any government or semi-government authorities or any other concerned intermediaries including but not limited to NSE, Securities and Exchange Board of India, Registrar of Companies, etc. to apply, modify, rectify and submit any

application(s) and/or related documents on behalf of the Company and to do all such acts, deeds and things as may be necessary and expedient to give effect to the this resolution.”

*By Order of the Board of Directors
For Accuracy Shipping Limited*

July 28, 2020
Kachchh

Vinay Dinanath Tripathi
Managing Director

NOTES:

1. The Explanatory Statement pursuant to Section 102(1) of the Companies Act, 2013 read together with Rule 22 of the Companies (Management and Administration) Rules, 2014 setting out material facts is annexed hereto.
2. The notice is being sent to all members / beneficiaries whose names appear on the Register of Members / Record of Depositories as on Friday, August 21, 2020 ('Cut-off-date') and who have registered their email addresses in respect of electronic holdings with the Depository through the concerned Depository Participants). A copy of this Postal Ballot Notice will also be available on the website of the Company (<http://www.aslindia.net/>) and in the relevant section of the website of NSE on which the Equity Shares of the Company are listed.
3. Based on the consent received from CS Piyush Prajapati, Practicing Company Secretary (Membership No. A50574, CP No. 18332), the Board has appointed him as the Scrutinizer to scrutinize the e-voting process in a fair and transparent manner.
4. In compliance with Regulation 44 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Listing Regulations') and Sections 108, 110 and other applicable provisions of the Companies Act, 2013, if any, read with the Rules made thereunder and the provisions of the MCA Circulars, the Company is providing facility for voting by electronic means ('remote e-voting') to all the members of the Company to enable them to cast their votes electronically on the items mentioned in the Postal Ballot Notice. For this purpose, the Company has entered into an arrangement with Central Depository Services (India) Limited ('CDSL') for facilitating remote e-voting to enable the shareholders to cast their votes electronically instead of physical mode. In terms the MCA Circulars, voting can be done only by remote e-voting. As the remote e-voting does not require a person to attend to a meeting physically, the members are strongly advised to use the remote e-voting procedure by themselves and not through any other person / proxies. The Resolutions, if approved by the requisite majority, will be taken as having been passed effectively on the last date specified for e-voting i.e. **Friday, October 9, 2020**.
5. As required by Rule 20 and Rule 22 of the Companies (Management and Administration) Rules, 2014 read with the MCA Circulars and the Listing Regulations, the details pertaining to this Postal Ballot will be published in at least one English language and one vernacular language newspaper.
6. Members who have not registered their e-mail addresses are requested to register the same with the Company's Registrars and Transfer Agents / Depository Participant(s) for the purpose of receiving this

Postal Ballot Notice by way of e-mail and communication of assent or dissent in respect of the resolutions set out in the said Postal Ballot Notice by way of remote e-voting.

7. The Scrutinizer shall prepare a consolidated Scrutinizer's Report on the total votes cast in favour or against, if any. The said report will be submitted to the Chairman or a person authorized by him in writing and the results of the voting shall be declared **not later than 5:00 pm on Saturday, October 10, 2020**. The said results will also be intimated to the National Stock Exchange of India Limited where the Company's securities are listed, and displayed on the website of the Company i.e. <http://www.aslindia.net/> as well as on the website of CDSL at www.evotingindia.com. In the event that the national lockdown on account of COVID-19 situation is eased off and the Company's offices are open for business, the Company will also display the results of the postal ballot at its registered office.
8. The Resolution, if passed by requisite majority, will be deemed to be passed on the last date specified for e-voting i.e. **Friday, October 9, 2020**. Further, resolution passed by the members through remote e-voting are deemed to have been passed effectively at a general meeting.
9. Please note that the assent or dissent received after such date and time shall be treated as if reply from the Member has not been received. For the purpose of exercising vote through remote e-voting, members are requested to read the information and other instructions relating to remote e-voting as mentioned below.

INFORMATION AND OTHER INSTRUCTIONS RELATING TO E-VOTING:

The voting period begins on Thursday, September 10, 2020 at 9:00 am (IST) and ends on Friday, October 9, 2020 at 5:00 pm (IST). During this period, members of the Company as on the cut-off date i.e. Friday, August 21, 2020, may cast their votes electronically. The e-voting module shall be disabled by CDSL thereafter.

- A. **In case of members who have registered their email addresses**, please follow the steps specified below:
 - i. Visit the e-Voting website of CDSL. Open web browser by typing the following URL: www.evotingindia.com either on a Personal Computer or on a mobile.
 - ii. Click on Shareholders.
 - iii. Now enter your USER ID:
 - a) For CDSL: 16 digits beneficiary ID.
 - b) For NSDL: 8 Character DP ID followed by 8 Digits Client ID.
 - iv. Next enter the Image Verification as displayed and Click on Login.
 - v. If you are holding shares in demat form and had logged on to www.evotingindia.com and voted on an earlier voting of any company, then your existing password is to be used.
 - vi. If you are a first time user, then follow the steps below:

For Members holding shares in Demat Form	
PAN	Enter your 10 digit alpha-numeric *PAN issued by Income Tax Department (Applicable for all shareholders) <ul style="list-style-type: none">• Members who have not updated their PAN with the Company / Depository Participant are requested to use the first two letters of their name and the 8 digits of the sequence number in the PAN field.

	<ul style="list-style-type: none"> In case the sequence number is less than 8 digits enter the applicable number of 0's before the number after the first two characters of the name in CAPITAL letters e.g. If your name is Ramesh Kumar with sequence number 1 then enter RA00000001 in the PAN field.
Dividend Bank Details OR Date of Birth (DOB)	<p>Enter the Dividend Bank Details or Date of Birth (in dd/mm/yyyy format) as recorded in your demat account or in the company records in order to login.</p> <ul style="list-style-type: none"> If both the details are not recorded with the depository or company, please enter the member id / folio number in the Dividend Bank details field as mentioned in instruction (v).

- vii. After entering these details appropriately, click on “SUBMIT” tab.
- viii. Members will now reach ‘Password Creation’ menu wherein they are required to mandatorily enter their login password in the new password field. Kindly note that this password is to be also used by the demat holders for voting for resolutions of any other company on which they are eligible to vote, provided that company opts for e-voting through CDSL platform. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.
- ix. On the voting page, you will see “RESOLUTION DESCRIPTION” and against the same the option “YES/NO” for voting. Select the option YES or NO as desired. The option YES implies that you assent to the Resolution and option NO implies that you dissent to the Resolution.
- x. Click on the “RESOLUTIONS FILE LINK” if you wish to view the entire Resolution details.
- xi. After selecting the resolution you have decided to vote on, click on “SUBMIT”. A confirmation box will be displayed. If you wish to confirm your vote, click on “OK”, else to change your vote, click on “CANCEL” and accordingly modify your vote.
- xii. Once you “CONFIRM” your vote on the resolution, you will not be allowed to modify your vote.
- xiii. You can also take a print of the votes cast by clicking on “Click here to print” option on the Voting page.
- xiv. If a demat account holder has forgotten the login password then Enter the User ID and the image verification code and click on Forgot Password & enter the details as prompted by the system.
- xv. **Note for Non – Individual Shareholders and Custodians**
- Non-Individual shareholders (i.e. other than Individuals, HUF, NRI etc.) and Custodian are required to log on to www.evotingindia.com and register themselves as Corporates.
 - A scanned copy of the Registration Form bearing the stamp and sign of the entity should be emailed to helpdesk.evoting@cdslindia.com.
 - After receiving the login details a Compliance User should be created using the admin login and password. The Compliance User would be able to link the account(s) for which they wish to vote on.
 - The list of accounts linked in the login should be mailed to helpdesk.evoting@cdslindia.com and on approval of the accounts they would be able to cast their vote.
 - A scanned copy of the Board Resolution and Power of Attorney (POA) which they have issued in favour of the Custodian, if any, should be uploaded in PDF format in the system for the scrutinizer to verify the same.

xvi. In case you have any queries or issues regarding e-voting, you may refer the Frequently Asked Questions (“FAQs”) and e-voting manual available at www.evotingindia.com, under help section or write an email to helpdesk.evoting@cdslindia.com.

B. In case of members who have not registered their email addresses: On account of threat posed by COVID-19 and in terms of the MCA Circulars, the Company will send Postal Ballot Notice in electronic form only and hard copy of Postal Ballot Notice along with Postal Ballot Forms and pre-paid business envelope will not be sent to the members for this Postal Ballot. Accordingly, the communication of the assent or dissent of the members would take place through the remote e-voting system only. Therefore, those members who have not yet registered their email address are requested to get their email addresses registered by following the procedure given below:

- i. In light of the MCA Circulars, shareholders who have not registered their email address and in consequence could not receive the Postal Ballot notice may get their email registered with their respective Depository Participant(s). Post successful registration of the email, the shareholder may write to Company at investors@aslindia.net, to get soft copy of the notice and the procedure for e-voting along with the User ID and the Password to enable e-voting for this Postal Ballot.
- ii. Those shareholders who have already registered their email address are requested to keep their email addresses validated with their Depository Participants / the Company’s Registrar and Share Transfer Agent to enable servicing of notices / documents / Annual Reports electronically to their email address.

EXPLANATORY STATEMENT PURSUANT TO SECTION 102 OF THE COMPANIES ACT, 2013

Resolution No 1:

The equity shares of the Company are listed and actively traded on the EMERGE Platform of National Stock Exchange of India Limited w.e.f. 22nd June, 2018. Listing on the Main Board of National Stock Exchange of India Limited will take the Company into a different league altogether with enhanced recognition and increased participation by retail investors. Likewise, the Company proposes to migrate its common stock listing / trading to the Main Board of National Stock Exchange of India Limited as per the guidelines laid down under Chapter IX of SEBI (ICDR) Regulations, 2018.

In accordance with guidelines specified under Chapter IX of ICDR Regulations the Company is eligible to migrate to the Main Board of National Stock Exchange of India Limited (‘NSE Limited’).

The Migration of the Company from SME Platform to Main Board of National Stock Exchange of India Limited is subject to approval of Members by way of passing Special Resolution in terms of Chapter IX of ICDR Regulations. The said Special Resolution shall be acted upon if and only if the votes cast by shareholders other than promoters in favour of the proposal amount to at least two times the number of votes cast by shareholders other than promoter shareholder against the proposal.

Accordingly, the Board recommends the resolution set forth in Item No. 1 to be passed as Special Resolution by the Members of the Company through Postal Ballot.

None of the Directors, Key Managerial Personnel or their relatives are in any way concerned or interested in the resolutions set forth in Item No. 1 of this Notice except to the extent of their shareholding held by them in the Company.

By Order of the Board of Directors
For Accuracy Shipping Limited

July 28, 2020
Kachchh

Vinay Dinanath Tripathi
Managing Director

IMPORTANT POINTS

1. In accordance with the provisions of Sections 108 and 110 of the Act read with the Rules, Regulation 44 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the MCA Circulars, the stated items of business shall be transacted through electronic voting system and the Company is providing facility for voting by electronic means (remote e-voting) to its Members.
2. The Company has engaged the services of Central Depository Services (India) Limited (CDSL) for providing remote e-voting facilities to the Members, enabling them to cast their vote in a secure manner.
3. E-voting is mandatory for members and is the only means to cast a vote on the stated items of business. Members may in accordance with the provisions of Sections 112 and 113, appoint representatives for the purpose of voting through remote e-voting.
4. Members are requested to follow the steps of e-voting specified in this Postal Ballot Notice for the purpose of communication of assent or dissent in respect of the resolutions set out in the said Postal Ballot Notice by way of remote e-voting.