

PDL/SEC./SE/2020-21/

July 23, 2020

National Stock Exchange of India Ltd.
"Exchange Plaza"
Bandra-Kurla Complex, Bandra (E),
Mumbai – 400 051

BSE Limited
Phiroze Jeejeebhoy Tower
Dalal Street,
Mumbai – 400 001

Dear Sirs,

Scrip Code No. : PARSVNATH-EQ (NSE); 532780 (BSE)

**Subject: Submission of Annual Secretarial Compliance Report
For the year ended March 31, 2020**

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed Annual Secretarial Compliance Report of the Company for the year ended March 31, 2020, given by M/s Upender Jajoo & Associates, Company Secretaries.

Please acknowledge the receipt.

Thanking you,

Yours faithfully,
For **Parsvnath Developers Limited**


(V Mohan)
**Company Secretary &
Compliance Officer**

Encl.: As above



**SECRETARIAL COMPLIANCE REPORT
OF
PARSVNATH DEVELOPERS LIMITED
For the year ended 31st March, 2020**

We, Upender Jajoo & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **PARSVNATH DEVELOPERS 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/ filings, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2020 ("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) Regulation, 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 for the period under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable for the period under review**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable for the period under review**

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For Parvsnath Developers Ltd.**

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- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations,2013; **Not Applicable for the period under review**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- 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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
N.A.	N.A.	N.A.	N.A.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.

- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
N.A.	N.A.	N.A.	N.A.	N.A.

Note: Attached is a update on the matter relating to 'Shell Companies'.

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

Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended _____ (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
N.A.	N.A.	N.A.	N.A.	N.A.

For Upender Jajoo & Associates,
Company Secretaries,
ICSI Unique Code: S2015DE307600

Signature: _____

Name of the Practicing Company Secretary: CS Upender Jajoo
FCS No.: 10155
C P No.: 14336
UDIN: F010155B000491416


Place: New Delhi
Date: 23 July, 2020



UPDATE ON SEBI SHELL COMPANIES MATTER

Further to the information and documents provided by us to Ernst & Young LLP (E&Y), we have not yet heard anything from either National Stock Exchange of India Limited (NSE) or E&Y regarding submission of Forensic Audit Report by E&Y.

In the meantime, SEBI had asked the Company to provide the details of all Directors, CEO, CFO and Compliance Officer and the minutes of Audit Committee Meetings held during Financial Years 2009-10, 10-11 and 11-12, which have been duly provided to them.



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For Parsvnoth Developers Ltd.**



Company Secretary