

**SRL/SE/16/19-20**

**Date: 29<sup>th</sup> May, 2019**

**The Secretary, Listing Department,**  
Department of Corporate Services  
BSE Limited  
Phiroze Jeejeebhoy Tower,  
Dalal Street,  
Mumbai – 400 001  
**Scrip Code: 512179**

**The Manager, Listing Department**  
National Stock Exchange of India Ltd  
Exchange Plaza,  
Plot no. C/1, G Block,  
Bandra-Kurla Complex  
Bandra (East), Mumbai- 400 051  
**Scrip Code: SUNTECK**

**Sub: Annual Secretarial Compliance Report for the financial year ended March 31, 2019.**

Dear Sir/Madam,

Pursuant to the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed the Annual Secretarial Compliance Report for the financial year ended March 31, 2019.

Kindly take the same on record.

Thanking You,  
**For Sunteck Realty Limited**

  
**Rachana Hingarajia**  
Company Secretary  
Encl: a/a



**Veeraraghavan .N**  
Practising Company Secretary

First Maritime Private Limited  
201 Gheewala Building  
Opp. New India Co-op Bank Limited  
M.P. Road, Mulund – East  
Mumbai - 400081  
Mob: 9821528844  
Email : nvr54@rediffmail.com

**Secretarial Compliance Report of Sunteck Realty Limited  
(CIN: L32100MH1981PLC025346) for the year ended March 31, 2019**

I, Veeraraghavan N. has examined:

- (a) all the documents and records made available to me and explanation provided by Sunteck Realty 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 March 31, 2019 (“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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996;

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)   | Deviations                                | Observations/ Remarks of the Practicing Company Secretary  |
|---------|--|---|--|
| 1.      | Regulation 17(8) of SEBI(LODR) Regulations, 2015 – The Compliance Certificate under the said Regulation is to be signed by both CEO and CFO. | The said Certificate is signed by the MD. | The CFO of the Company had resigned on 2 <sup>nd</sup> April, 2018 and new CFO is not yet appointed. |

- (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 my 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<br>E.g. fines, warning letter, debarment, etc. | Observations/ remarks of the Practicing Company Secretary, if any. |
|---------|-----------------|----------------------|--|--|
|         |                 | Nil                  |  |  |
|         |                 |                      |  |  |

(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... | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|--|--|--|
|         |  | Not Applicable   |  |  |

Signature: 

Veeeraraghavan. N  
ACS No.: 6911  
C P No.: 4334



Mumbai  
28<sup>th</sup> May, 2019