

June 29, 2021

<p><b>The General Manager – DCS,</b> Listing Operations-Corporate Services Dept. BSE Ltd. 1<sup>st</sup> Floor, New Trading Ring, Rotunda Building, 'P J. Towers, Dalal Street, Fort, <b>Mumbai</b> <b>400 001.</b></p> <p><a href="mailto:corp.relations@bseindia.com">corp.relations@bseindia.com</a> <b>Stock Code: 532891</b></p>	<p><b>The Manager,</b> Listing Department, National Stock Exchange of India Ltd., Exchange Plaza, 5th Floor, Plot No. C/1, G Block, Bandra-Kurla Complex, Bandra (E), <b>Mumbai</b></p> <p><a href="mailto:cc_nse@nse.co.in">cc_nse@nse.co.in</a> <b>Stock Code: PURVA</b></p>
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Dear Sir / Madam,

Sub: Annual Secretarial Compliance Report - Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular: CIR/CFD/CMD1/27/2019 dated February 8, 2019

Pursuant to the referred Regulation, please find attached the Annual Secretarial Compliance Report for the period 2020-21.

Yours faithfully  
For Puravankara Limited

Bindu D  
Company Secretary

## PURAVANKARA LIMITED



**JKS & Co.**

**Company Secretaries**

E-003, Victoria Haven Patel Ram Reddy Road

Domlur 1st Stage Bangalore-560071

GSTIN/UIN: 29AALFJ1836A1ZI

**Secretarial Compliance Report of Puravankara Limited for the year ended 31.03.2021**

To,  
**Puravankara Limited,**  
No.130/1, Ulsoor Road,  
Bengaluru – 560 042

1. We, JKS & Co., Company Secretaries, have examined:
  - (a) all the documents and records made available to us and explanation provided by Puravankara Limited ("the listed entity"),
  - (b) the filings/ submissions made by the listed entity to the stock exchanges,
  - (c) website of the listed entity,for the year ended 31<sup>st</sup> March 2021 ("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");
2. 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; [Not applicable to the listed entity during the review period since the entity did not initiate any fresh issue of capital]
  - (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 to the listed entity during the review period, since the entity did not initiate any buy-back]
  - (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; [Not applicable to the listed entity during the review period]
  - (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; [Not applicable to the listed entity during the review period]
  - (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; [Not applicable to the listed entity during the review period]
  - (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and

B.O. : Unit No. 305, 3rd floor, 50, Huligadri Renaissance Landmark, 17th Cross, 10th Main,  
Malleswaram, Bangalore - 560 003





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- (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, taking into consideration the relaxation notifications issued by SEBI due to outspread of Covid-19, 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.	U/R 29(2)/(3) of SEBI LODR, the listed entity is required to give at least two /five days prior notice in order to consider certain items at its meeting of Board of directors.	The Board had in its meeting on 11.09.2020, considered Issue of NCDs on private placement basis. There is a delay in submission of the prior notice.	The Company has, subject to SEBI Circular No. 2018/77 dated May 3, 2018, paid the prescribed fine to both the two stock exchanges viz. BSE & NSE.

\* The Company's management has informed us that, post covid-19 lockdown, considering the extreme work pressure on staff and system (such as postal ballot closure and AGM related compliances), though the disclosure was ready for upload, there was a glitch resulting in the delay.

- (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:





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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.
1.	The Company received notice for the above stated deviation and has paid the fine as stipulated.			

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

Sr. No.	Observations of the Practicing Company Secretary in the previous report	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
1.	U/R 29(2)/(3) of SEBI LODR, the listed entity is required to give at least two days prior notice in order to consider certain items at its meeting of Board of directors.	31st March, 2020	The Company stated that they have a system in place to report in time. However, the delay in filing happened due to some technical issues/ system error.	Though there are systems in place to ensure timely compliances, during the current scrutiny period also, a similar delay is observed, due work pressure consequent to covid-19 . The Company has now recruited additional manpower to ensure timely reporting.

For JKS & Co.

Company Secretaries



*Karthick V.*

Karthick V.

Partner

Membership No. ACS – 11910

C.P. No. – 4680

Firm Unique No. P2015KR040800

Place : Bengaluru

Date : June 24, 2021

UDIN : A011910C000508725

B.O. : Unit No. 305, 3rd floor, 50, Huligadri Renaissance Landmark, 17th Cross, 10th Main,  
Malleswaram, Bangalore - 560 003