



To,
The Assistant Manager,
National Stock Exchange of India Limited Listing
Department,
'Exchange Plaza', Bandra Kurla Complex,
Bandra (East),
Mumbai – 400051

To,
The General Manager,
BSE Limited
Corporate Relationship Department,
1st floor, Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400001

30 June 2021

Sub.: Annual Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended March 31, 2021

**Ref: NSE Symbol and Series: KOLTEPATIL and EQ
BSE Code and Scrip Code: 9624 and 532924**

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 please find enclosed herewith the Annual Secretarial Compliance Report for the year ended March 31, 2021.

This is for your information and record.

For Kolte-Patil Developers Limited

**Vinod Patil
Company Secretary and Compliance Officer
Membership No. A13258**

KOLTE-PATIL DEVELOPERS LTD.

CIN : L45200PN1991PLC129428

Pune Regd. Office: 2nd Floor, City Point, Dhole Patil Road, Pune 411001. Maharashtra, India. Tel.: +91 20 6622 6500 Fax : +91 20 6622 6511
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Web.: www.koltepatil.com

**Secretarial compliance report of Kolte-Patil Developers Limited
For the year ended March 31, 2021**

To,

Kolte-Patil Developers Limited,
2nd Floor, City Point,
Dhole Patil Road, Pune 411001

We **SVD & Associates** have examined:

- a) All the documents and records made available to us by electronic mode, in view of the prevailing Pandemic situation of COVID -19 and explanation provided by **Kolte-Patil Developers Limited** (“the listed entity”),
- b) The filings/ submissions made by the listed entity to the stock exchanges,
- c) The website of the listed entity,
- d) Other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **March 31, 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”);

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 (“LODR”);

- 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);**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018 **(not applicable to the listed entity during the review Period);**
- 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 **(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;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulation, 2018
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; 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
i.	<i>Clause (a) of sub regulation (1) of regulation 34 of LODR requires the listed entity to submit to the stock exchange and publish on its website, a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders.</i>	<i>The listed entity was required to submit a copy of Annual Report along with notice of Annual General Meeting to the stock exchange on September 05, 2020, being the date of dispatch to its shareholders. However the same is submitted on September 06, 2020 with a delay of one day.</i>	<i>The listed entity shall ensure necessary compliance to the extent of deviation reported in compliance of clause (a) of sub regulation (1) of regulation 34 of LODR for timely submission of a copy of annual report along with notice of the annual general meeting to the stock exchange.</i>

2.	Sub regulation 3 of regulation 47 of LODR requires the listed entity to publish the information specified in sub-regulation (1) of regulation 47 in the newspaper simultaneously with the submission of the same to the stock exchange(s).	The listed entity has published newspaper notice relating to the Annual General Meeting to be held on September 28, 2020 on September 15, 2020, However, the listed entity has submitted said notice to stock exchange(s) on September 06, 2020. There is a delay of 9 days in publishing the said notice.	The listed entity shall ensure necessary compliance to the extent of deviation reported in compliance of sub-regulation 3 of regulation 47 of LODR for timely publishing of information specified in sub-regulation 1 of regulation 47 in news paper.
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(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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
	Nil	Nil	Nil	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(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
	Nil	Nil	Nil	Nil

(e) The company has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment/re-appointment of statutory auditor of the Company.

For SVD & Associates
Company Secretaries

SRIDHAR
GOPALKRIS
HNA
MUDALIAR

Digital signed by: SRIDHAR
GOPALKRISHNA MUDALIAR
DN: cn=SRIDHAR GOPALKRISHNA
MUDALIAR, o=SVD&Associates
Private
www.hna.com, c=IN, postalCode=411004
279628658626e0a9728520
8085a22a-c9b
Date: 2021.05.31 08:41:53 +05'30'

Sridhar G Mudaliar
Partner
FCS No: 6156
CP No: 2664

Place: Pune
Date: May 31, 2021
UDIN: F006156C000391057