

Sunteck Realty Ltd.



SRL/SE/14/24-25

Date: 29th May, 2024

National Stock Exchange of India Ltd
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex, Bandra (East),
Mumbai - 400 051
Symbol: SUNTECK

BSE Limited
Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai - 400 001
Scrip Code: 512179

Sub: Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2024

Dear Sir/Madam,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and in terms of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we hereby submit the Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2024.

Kindly take the same on record.

Thanking You.

For Sunteck Realty Limited

Rachana Hingarajia
Company Secretary
Encl: a/a

Veeraraghavan. N
Practicing Company Secretary
B. Sc., LLB., A.C.S.

11- H – 304, Neelam Nagar, Phase-2
Mulund East, Mumbai – 400081
Mob: 9821528844
Email: nvr54@ymail.com

**Secretarial Compliance Report of Sunteck Realty Limited
(CIN: L32100MH1981PLC025346) for the year ended 31st March, 2024
[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure
Requirements) Regulations, 2015]**

I, Veeraraghavan N. have 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 31st March, 2024 (“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; (Not applicable to the Company during Review Period);
- (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 Company during Review Period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable to the Company during Review Period);

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- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
 and circulars/guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period, the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	-
2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI. 	Yes Yes	- -
3.	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none"> The Listed entity is maintaining a functional website Timely dissemination of the documents/information under a separate section on the website Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website. 	Yes Yes Yes	- - -

Veeraraghavan. N

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4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under section 164 of Companies Act, 2013	Yes	-
5.	<u>To examine details related to Subsidiaries of listed entities:</u> a) Identification of material subsidiary companies b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes Yes	- -
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	-
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	-
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions. (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/ rejected by the Audit committee.	Yes NA	- The Company has obtained prior approval of Audit Committee for all Related Party Transactions.

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9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	-
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/its promoters/directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or) The action(s) taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Yes	As mentioned in the observations under table (a) appended below.
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and/ or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities	NA	There was no resignation of Statutory Auditors from the listed entity or its material subsidiaries during the financial year under review.

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13.	Additional Non-compliances, if any: No any additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	-
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(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)	Regulation/ Circular No.	Deviations	Action taken by	Type of Action	Details of violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Submission of Voting Results within two working days of conclusion of the Postal Ballot	Regulation 44(3) of the SEBI (Listing Obligations and Disclosure Requirements), 2015	Delay of 1 (One) working day in submission of the voting results on BSE Portal in XBRL mode	BSE Limited	BSE Limited has imposed a fine of Rs. 11,800/- (including GST) vide email dated 15 th April, 2024	Delay in submission of the disclosure under Regulation 44(3) on BSE Portal in XBRL mode.	Rs. 11,800/- (including GST)	The Company has paid fine on 30th April, 2024 vide UTR No. AXSK24121 0020934	Disclosure was submitted to NSE in PDF and XBRL mode within the prescribed time period. Further, disclosure was submitted to BSE in PDF mode within the prescribed time period. However, due to technical reasons and reasons beyond the reasonable control of the Company, there was a marginal delay in submission of the disclosure on the BSE portal in XBRL mode.	The Company has also submitted a waiver application to BSE Limited and their response is awaited.

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

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action taken by	Type of Action	Details of violations	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Remarks
NIL										

Signature:

VEERARAGH AVAN NARAYANA N	Digitally signed by VEERARAGHAVAN NARAYANAN Date: 2024.05.28 21:28:39 +05'30'
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Veeraraghavan N.
ACS No. 6911
C.P.No.4334
UDIN: A006911F000476886
Peer Review: 1227/2021
Date: 28th May, 2024
Place: Mumbai