

MARATHON NEXTGEN REALTY LIMITED



Regd. Off.: Marathon Futurex, N.M. Joshi Marg, Lower Parel, Mumbai 400 013
Tel.: +91-22-6724 8484 Fax: +91-22-6772 8408 CIN: L65990MH1978PLC020080
E-mail: shares@marathonnextgen.com Website: www.marathonnextgen.com

April 28, 2021

To
BSE Limited
Dept. of Corporate Services
P. J. Towers, Dalal Street
Mumbai 400 001
Scrip Code: 503101

To
National Stock Exchange of India Limited
Listing Department
BKC, Bandra (E)
Mumbai 400 051
Symbol: MARATHON

Sub: **Annual Secretarial Compliance Report under regulation 24A of SEBI (LODR) Regulations, 2015 for the year ended March 31, 2021**

Dear Sirs,

Pursuant to the Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are submitting the Annual Secretarial Compliance report under regulation 24A of SEBI (LODR) Regulations, 2015 for the Year ended March 31, 2021.

Kindly take the above on record.

Yours faithfully,

For Marathon Nextgen Realty Limited

K. S. Raghavan
Company Secretary & Compliance Officer

Encl.: as above

Nitin R. Joshi

**B.COM., LL.B., D.C.E.C., F.C.S.
COMPANY SECRETARY**

415, Marathon Max, Next to Udyog Kshetra, Jn. of L.B.S. Marg & Goregoan Link Road, Mulund (W),
Mumbai-400 080. Tel. 2562 5660/2562 5661. Cell 98201 29178.

**Secretarial compliance report under regulation 24A of SEBI(LODR) Regulations, 2015 of
Marathon Nextgen Realty Limited for the Year ended March 31, 2021**

I Nitin R. Joshi have examined:

- (a) all the documents and records made available to me and explanation provided by Marathon Nextgen Realty Limited CIN- L65990MH1978PLC020080 ("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, 2021 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 there under; 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;

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, as applicable to it. However regulations mentioned above under clause (b),(d),(f) and (g) are not applicable to the Company during the review period.
- (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 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 there under:

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	Stock Exchange(s) BSE & NSE	<p>(i) Non-submission of voting results within Forty - eight hours of conclusion of Postal Ballot. The last date for receipt of Postal Ballot forms was March 27, 2020.</p> <p>(ii) Non-submission of voting results within forty-eight hours of conclusion of NCLT convened meeting held on March 23, 2020.</p>	<p>Company has made written submissions to the exchanges for waiver of fine.</p> <p>The Exchanges has quoted: "After considering the submissions of MARATHON The committee further noted that the MARATHON has put on record sufficient facts to demonstrate the reason for delay in complying with the requirements of Regulation 44(3) of SEBI (LODR) Regulations, 2015. The Committee finds that the reason provided by MARATHON fall within the purview of Exchange's policy for exemption of fines. The Committee therefore decided to accept the request for waiver of fine aggregating to Rs.20,000/-"</p>	---

(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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Nitin
Ramnikl
al Joshi

Digitally signed
by Nitin
Ramnikl Joshi
Date:
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16:31:08 +05'30'

(NITIN R JOSHI)

Practicing Company Secretary
FCS No.: 3137-- C P No. : 1884
UDIN number F003137C000187244

Place: Mumbai

Date : 27/04/2021