

PDL/SEC./SE/2022-23/

May 10, 2022

National Stock Exchange of India Ltd.  
"Exchange Plaza"  
Bandra-Kurla Complex, Bandra (E),  
Mumbai – 400 051

BSE Limited  
Phiroze Jeejeebhoy Tower  
Dalal Street,  
Mumbai – 400 001

Dear Sirs,

**Scrip Code No. : PARSVNATH-EQ (NSE); 532780 (BSE)**

**Subject: Submission of Annual Secretarial Compliance Report  
For the year ended March 31, 2022**

Pursuant to Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find attached Annual Secretarial Compliance Report of the Company for the year ended March 31, 2022, given by M/s Upender Jajoo & Associates, Practicing Company Secretaries.

Please acknowledge the receipt.

Thanking you,

Yours faithfully,  
For Parsvnath Developers Limited

(Mandan Mishra)  
Company Secretary &  
Compliance Officer

Encl.: As above



**SECRETARIAL COMPLIANCE REPORT  
OF  
PARSVNATH DEVELOPERS LIMITED  
For the year ended 31<sup>st</sup> March, 2022**

We, Upender Jajoo & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **PARSVNATH DEVELOPERS 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/ filings, as may be relevant, which has been relied upon to make this certification,

**for the year ended 31<sup>st</sup> March, 2022 ("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) Regulation, 2015;**
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable for the period under review**
- (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 for the period under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable for the period under review**

CERTIFIED TRUE COPY  
For Parsvnath Developers Ltd.

Company Secretary

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- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable for the period under review**
- (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, 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
N.A.	N.A.	N.A.	N.A.

- (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:

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.
N.A.	N.A.	N.A.	N.A.	N.A.

**Note: Attached is a update on the matter relating to 'Shell Companies'.**

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For Parsvnath Developers Ltd.

Company Secretary

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*Upender Jajoo & Associates  
Company Secretaries*

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

<b>Sr. No</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended 31.03.2021</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
N.A.	N.A.	N.A.	N.A.	N.A.

**For Upender Jajoo & Associates,  
Company Secretaries,  
ICSI Unique Code: I2015HR1272100**

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**JAJOO** Date: 2022.05.10  
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Signature: \_\_\_\_\_

**Name of the Practicing Company Secretary: CS Upender Jajoo  
FCS No.: 10155  
C P No.: 14336  
UDIN: F010155D000293647**

**Place: New Delhi  
Date: 10<sup>th</sup> May, 2022**

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For Parsvnath Developers Ltd.**

  
**Company Secretary**



*Upender Jajoo & Associates  
Company Secretaries*

**UPDATE ON SEBI SHELL COMPANIES MATTER**

The Company had received a Show Cause Notice (SCN) dated 19.10.2020 from SEBI addressed to the Company and the Directors/ CFOs who were holding office during the financial years 2009-10 to 2011-12. The SCN was replied by the Company and also requested for a personal hearing before Whole Time Member (WTM), SEBI.

The SEBI informed the Company and the other Noticee to appear before Shri Ananta Barua, Whole Time Member (WTM), SEBI in online hearing.

On the hearing scheduled on October 25, 2021, where the senior counsel appeared on behalf of the Company concluded the arguments. The WTM also heard the other Noticees. Some of the Noticees sought further time to file their reply and requested for the same before the WTM. The WTM has allowed them to file their reply before the next date of hearing to be announced by SEBI. The SEBI has scheduled a hearing on December 31, 2021 for filing of reply of other Noticees. On the appointed date of hearing other Noticees were made their representation before WTM. Now, the final order of SEBI awaited.

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For Parsvnath Developers Ltd.**

  
**Company Secretary**