



Kiran Amarpuri

Company Secretary in whole time practice

V-56, First Floor, West Patel Nagar,
Near Shadipur Metro Station,
West Patel Nagar
New Delhi - 110008.

Phone : 011-45140214 (O) 9911127572 (Mobile)

Email : kiranamarpuri@hotmail.com
kiranamarpuri@gmail.com

**Secretarial Compliance Report of Unitech Limited
for the Financial Year ended 31st March, 2024**

*(In pursuance to regulation 24A (2) of the Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015)*

I, Kiran Amarpuri, Practicing Company Secretary, having been authorized by the Board of Directors of Unitech Limited (CIN: L74899DL1971PLC009720) in its meeting held on 26.10.2023, to prepare Secretarial Compliance Report of the Company for the FY ended **31st March, 2024**, I have examined the following including various Circulars/ guidelines issued by the SEBI from time to time:

- (i) All the documents and records made available to us and explanation provided by Unitech Limited (“the listed Entity”);
- (ii) The filings/ submissions made by the listed Entity to the Stock Exchanges;
- (iii) Website of the listed Entity; and
- (iv) Any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March 2024 in respect of compliances with the provisions of the:
 - (a) Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the regulations, circulars, guidelines issued thereunder; and
 - (b) 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:

- (i) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement(s) Regulations, 2015; and
- (ii) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018:

Not Applicable to the Company during the Financial Year under review.

- (iii) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011:



The Hon'ble Supreme Court vide its order dated 20.01.2020 in Civil Appeal No.10856/2016 has appointed the new Management consisting of Central Government's Nominee Directors by replacing the old Management. Further, the Hon'ble Supreme Court was also pleased to grant moratorium on proceedings, both existing and new. The Resolution Framework is pending for consideration before the Apex Court. Hence, in view of the above, no disclosures were made during the period under review.

- (iv) Securities and Exchange Board of India (Buy back of Securities) Regulations, 2018:

Not Applicable to the Company for the Financial Year under review.

- (v) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021:

Not Applicable to the Company for the Financial Year under review.

- (vi) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008:

Not Applicable to the Company for the Financial Year under review.

- (vii) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021:

Not Applicable to the Company for the Financial Year under review.

- (viii) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

- (ix) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021:

Not Applicable to the Company for the Financial Year under review.

- (x) SEBI (Investor Protection and Education Fund) Regulations, 2009:

Not Applicable to the Company during the Financial Year under review.

I hereby report that, during the Review Period:

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.	Minimum Number of Directors on the Board of the Top 2000 Companies in terms of market capitalization.	Regulation 17 (1) (c) of SEBI (LODR) Regulations, 2015	Board of Directors comprises of 5 Directors Only	BSE & NSE	Issue of letter	Board of Directors consist of less than 6 Directors	-	No appointment of Director in compliance is observed	(i) All the Directors on the Board of M/s Unitech Limited have been appointed by the Union of India (Ministry of Corporate Affairs), with the prior approval of Hon'ble Supreme Court, granted vide its Orders dated 20.01.2020 and 13.10.2022. (ii) The process for the appointment of the sixth Director on the Board of M/s Unitech Limited has already been initiated by Union of India (Ministry of Corporate Affairs). (iii) The Ministry of Corporate Affairs has, vide its letter bearing No. F.N.10/ 1 / 2020-Legal dated 21.05.2024 directed the Regional Director (Northern Region), Ministry of Corporate Affairs, to move an application before the Hon'ble Supreme Court for seeking its approval of one more Director on the Board of M/s Unitech Limited.	
2.	Age Limit for Non-Executive Director .	Regulation 17 (1A) of	One of the Non-	BSE & NSE	Issue of letter	One of the Non-Executive Director	-	The Director has been appointed by	(i) All the Directors on the Board of M/s Unitech Limited have	



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
		SEBI (LODR) Regulations, 2015	Executive Director do not comply the requirement of the Regulation			does not comply with the age requirement of the Regulations.		orders of Hon'ble Supreme Court	been appointed by the Union of India (Ministry of Corporate Affairs), with the prior approval of Hon'ble Supreme Court, granted vide its Orders dated 20.01.2020 and 13.10.2022. (ii) Since all the Nominee Directors have been appointed by the Union of India with the prior approval of Hon'ble Supreme Court, the Unitech is not in a position to interfere.	
3.	Submission of Financial Results for the quarter and year ended 31.03.2023. Due date was 30.05.2023.	Regulation 33 of SEBI (LODR) Regulations, 2015	Not filed within prescribed time	BSE & NSE	Levy of fine	Submitted on 29.08.2023	Rs. 2,83,200/- each	The Company has not paid fine in terms of SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated 11 th July, 2023.	(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management. (ii) It was on account of inherent legacies, which were beyond the control of the new Management, that there was some delay in finalizing and approving the Financial Results for the quarter and year ended 31.03.2023. (iii) The Annual Accounts for FY	



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
									<p>2022-23 were, however, subsequently finalized and approved by the Board of Directors in its meeting held on 29.08.2023.</p> <p>(iv) It is pertinent to mention that all the Financial Results for the FY 2022-23 and FY 2023-24 have now been finalized and approved by the Board of Directors and submitted to the Exchanges as required.</p> <p>(v) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, vide which the following reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IA have been sought:</p> <p>(a) Ministry of Corporate Affairs (MCA), Registrar of Companies and any other regulatory authorities be directed to condone the defaults in compliances/</p>	



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
									<p>procedural lapses in respect of Unitech group companies.</p> <p>(b) Preparation and filing of financial statements and annual returns.</p> <p>(c) Constitution of Board or any other formalities related to the appointment of Directors/ cessation of Directors.</p> <p>(d) Holding of Board Meetings and Annual General Meeting as required under Companies Act, 2013.</p> <p>(e) Appointment/ re-appointment of Statutory Auditors.</p> <p>(f) Filing of any other form as required under Companies Act, 2013.</p> <p>(g) Full waiver of the amount of penalties/ or interest, if any.</p> <p>(h) Direct that the liability of Unitech Group be restricted to payment of the statutory filing fees alone.</p> <p>(i) Direct the National Stock</p>	



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
									<p>Exchange of India Limited (NSE), the Bombay Stock Exchange Limited (BSE), National Securities Depository Ltd. (NSDL) & Central Depository Services (India) Ltd. (CDSL) to furnish details/ account of the entire outstanding amounts due till date; waive of all penalties/ interest components and one-time waiver of the past liabilities created in the form of interest or penalties on account of the non-compliances by the erstwhile management;</p> <p>(j) Pass any other/ further orders in favour of the applicant, as this Hon'ble Court deems fit and appropriate in the facts and circumstances of the present case.</p> <p>(vi) The necessary action about the payment of fine, in terms of SEBI Master Circular No. SEBI/ HO/ CFD/ PoD2/ CIR/P / 2023/ 120 dated 11.07.2023 would, therefore, be taken only</p>	



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
									after the adjudication of IAs.	
4.	Submission of Financial Results for the quarter ended on 30.06.2023. Due date was 14.08.2023.	Regulation 33 of SEBI (LODR) Regulations, 2015	Not filed within prescribed time	BSE & NSE	Levy of fine	Submitted on 21.12.2023.	Rs. 1,77,000/- each.	The Company has not paid fine in terms of SEBI Master Circular No. SEBI/HO/ CFD/ PoD2/CIR/P/2023/120 dt. 11 th July, 2023	<p>(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management.</p> <p>(ii) It was on account of inherent legacies, which were beyond the control of the new Management, that there was some delay in finalizing and approving the Financial Results for the quarter ended 30.06.2023.</p> <p>(iii) It is pertinent to mention that all the Financial Results for the FY 2022-23 and FY 2023-24 have now been finalized and approved by the Board of Directors and submitted to the Exchanges as required.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs</p>	



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
									<p>bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine, in terms of SEBI Master Circular No. SEBI/ HO/ CFD/ PoD2/ CIR/ P / 2023/ 120 dated 11.07.2023 would, therefore, be taken only after the adjudication of IAs.</p>	
5.	Submission of Financial Results for the quarter ended on 30.09.2023. Due date was 14.11.2023.	Regulation 33 of SEBI (LODR) Regulations, 2015	Not filed within prescribed time	BSE & NSE	Levy of fine	Submitted on 21.12.2023.	Rs, 2,12,400/- each-	The Company has not paid fine in terms of SEBI Master Circular No. SEBI/HO/ CFD/ PoD2/CIR/P/2023/120 dt. 11 th July, 2023.	<p>(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management.</p> <p>(ii) It was on account of inherent legacies, which were beyond the control of the new Management, that there was some delay in finalizing and</p>	



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
									<p>approving the Financial Results for the quarter and half year ended 30.09.2023.</p> <p>(iii) It is pertinent to mention that all the Financial Results for the FY 2022-23 and FY 2023-24 have now been finalized and approved by the Board of Directors and submitted to the Exchanges as required.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine, in terms of SEBI Master Circular No. SEBI/ HO/ CFD/ PoD2/ CIR/P / 2023/ 120 dated 11.07.2023 would, therefore, be taken only after the adjudication of IAs.</p>	



A. M/s Unitech Limited has taken the following action to comply with the observations issued by me 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 Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Disclosure of related party transactions on consolidated basis within 30 days from the date of publication of results for half year ended on 31.03.2019; Due date was 18.08.2019.	Regulation 23(9) of SEBI LODR	Not filed within prescribed time.	-	-	Not Submitted	-	No fine is prescribed pursuant to SEBI Circular No. SEBI/HO/CFD/CMD/C IR/P/2018/77 dt. 3 rd May, 2018.	<p>(i) Till March 2019, the Company was following the practice of preparing Related Party transactions on an annual basis for the purpose of Annual Financial Statements of the Company. The requirement of half yearly RPT disclosure was inserted with effect from the half year ended March 31, 2019, pursuant to SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2020 dated 10th January, 2020.</p> <p>(ii) The financials for this period were prepared by the erstwhile Management. The RPT for the half year ended 31st March, 2019 was neither prepared nor was it submitted with the Stock Exchanges. Necessary steps are now being taken by the new Management to ensure that the Entity becomes compliant in all respects. The Company is making every possible efforts to file all documents/ reports to the Stock Exchanges under the SEBI (Listing</p>	



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
									Obligations and Disclosure Requirements) Regulations, 2015 within the prescribed timelines.	
2.	Preparation, approval, submission and publication of Financial Results for the quarter ended on 30.09.2019.	Regulation 33 of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 09.11.2020	Rs. 2,12,400/- each	Financial Results have been submitted on 09.11.2020. Fine paid by the Company pursuant to invoices raised by NSE & BSE, both for the period up to 20 th December 2019.	(i) The said non-compliance pertains to the time-period of the erstwhile Management which has since been superseded by the Hon'ble Supreme Court vide its order dated 20.01.2020. (ii) Hence, in view of the above, the new Management cannot comment on this.	
3.	Disclosure of related party transactions within 30 days from the date of publication of results for half year ended on 30.09.2019.	Regulation 23(9) of SEBI LODR	Not filed within prescribed time	BSE & NSE	-	Not submitted	-	No fine is prescribed pursuant to SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2018/77 dated 3 rd May, 2018.	(i) The said non-compliance pertains to the period of the erstwhile Management, which has since been superseded by the Hon'ble Supreme Court vide its order dated 20.01.2020. (ii) The new Management is taking all necessary steps to ensure that the Company becomes fully compliant in all respects, for which all possible efforts are being made to file all documents/ reports to the Stock Exchanges under the SEBI (LODR) Regulations, 2015 within the prescribed timelines. (iii) Further, the Company is now fully updated and compliant with respect to the requisite disclosures	Covid Period



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
									of Related Party Transactions to the Exchanges. As far as the disclosure of Related Party Transactions for the half year ended 30.09.2023 and 31.03.2024 is concerned, it is pointed out that it has already been submitted to the Exchanges within the stipulated timelines.	
4.	Preparation, approval, submission and publication of Financial Results for the quarter ended on 31.12.2019 Due date was 14.02.2020.	Regulation 33 of SEBI (LODR)	Not filed within prescribed time.	BSE	Levy of fine	Submitted on 09.11.2020	Rs. 1,88,800/- (BSE)	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22nd January, 2020	<p>(i) The new Management was appointed by Union of India with the prior approval of the Hon'ble Supreme Court, vide its order dated 20.01.2020 whereas the due date for making compliance of preparation, approval, submission and publication of Financial Results for the quarter ended 31.12.2019 was 14.02.2020.</p> <p>(ii) Since the said non-compliance pertains to the period of the erstwhile management (since superseded by the Hon'ble Supreme Court), the non-compliance is not attributable to the new Management.</p> <p>(iii) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs</p>	



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
									<p>bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(iv) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
5.	Delay in submission of Quarterly Share holding pattern for the Quarter ended on 31.03.2020; Due date was 21.04.2020, which was further extended upto 15.05.2020.	Regulation 31 of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 08.06.2020	Rs. 37,760/- each	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020	(i) The delay was on account of Covid-19 pandemic and, hence, beyond the control of the new Management appointed with the prior approval of the Hon'ble Supreme Court.	Covid Period
6.	Submission of audited financial results for quarter and year ended	Regulation 33 of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 09.11.2020	Rs. 94,400/- each	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/	(i) The delay was on account of Covid-19 pandemic and, hence, beyond the control of the Management appointed with the	Covid Period



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
	31.03.2020; Due dates was 15.05.2020 which was further extended upto 31.07.2020.							12 dt. 22 nd January, 2020.	prior approval of the Hon'ble Supreme Court.	
7.	Disclosure of related party transactions within 30 days from the date of publication of results for half year ended 31.03.2020. Due date was 09.12.2020.	Regulation 23(9) of SEBI (LODR)	Not filed within prescribed time	BSE & NSE	-	Not Submitted	-	No fine is prescribed under SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	<p>(i) The said non-compliance pertains to the period of the erstwhile Management, since superseded by the Hon'ble Supreme Court vide its order dated 20.01.2020.</p> <p>(ii) The new Management is taking all necessary steps to ensure that the Company becomes fully compliant in all respects, for which all possible efforts are being made to file all documents/ reports to the Stock Exchanges under the SEBI (LODR) Regulations, 2015 within the prescribed timelines.</p> <p>(iii) Further, the Company is now fully updated and compliant with respect to the requisite disclosures of Related Party Transactions to the Exchanges. As far as the disclosure of Related Party Transactions for the half year ended 30.09.2023 and 31.03.2024 is concerned, it is pointed out that it has already been submitted to the Exchanges within the</p>	Covid Period



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
									stipulated timelines.	
8.	Submission of financial results for the quarter ended 30.06.2020; Due date was 14.08.2020 which was further extended upto 14.09.2020.	Regulation 33 of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 23.03.2022	Rs. 1,82,900/- each	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22 nd January, 2020	<p>(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management.</p> <p>(ii) It was on account of the inherent legacies that there was delay in finalizing and approving the financial results of the Company for the quarter ended 30.06.2020.</p> <p>(iii) It is pertinent to mention that all the Financial Results upto the FY 2023-24 have been finalized by the Board of Directors and submitted to the Exchanges.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the</p>	



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
									<p>aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
9.	Submission of financial results for the quarter ended 30.09.2020; Due date was 14.11.2020.	Regulation 33 of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 08.06.2022	Rs. 1,59,300/- each	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020	<p>(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management.</p> <p>(ii) It was on account of the inherent legacies that there was delay in finalizing and approving the financial results of the Company for the quarter and half year ended 30.09.2020.</p> <p>(iii) It is pertinent to mention that all the Financial Results upto the FY 2023-24 have already been finalized by the Board of Directors and submitted to the Exchanges.</p>	



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
									<p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs</p>	
10.	Submission of Quarterly Share holding pattern for the Quarter ended on 31.12.2020; Due date was 21.01.2021	Regulation 31 of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 14.04.2021	Rs. 59,900/- each	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020.	<p>(i) The delay in filing of Shareholding Pattern was due to "Benpos" not having been provided by the Depositories to the RTA of the Company for want of payment of their Annual Custody Fees for the FY 2020-21.</p> <p>(ii) There was delay in payment of Annual Custody Fee due to the onset of Covid-19 Pandemic and</p>	



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
									<p>resultant pan-India lockdown and its after-effects, which was beyond the control of the new Management appointed with the prior approval of the Hon'ble Supreme Court.</p> <p>(iii) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(iv) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
11.	Submission of financial results for the quarter ended 31.12.2020; Due date was	Regulation 33 of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 08.06.2022	Rs. 1,65,200/- each	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January,	(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws	



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
	14.02.2021							2020.	<p>which the new Management inherited from the superseded Management.</p> <p>(ii) It was on account of the inherent legacies that there was delay in finalizing and approving the financial results of the Company for the quarter and nine months ended 31.12.2020.</p> <p>(iii) It is pertinent to mention that all the Financial Results upto the FY 2023-24 have already been finalized by the Board of Directors and submitted to the Exchanges.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/</p>	



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
									CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.	
12.	Submission of Secretarial Compliance Report for the period March 2021 within the prescribed time. Original Due date was 30.05.2021. which was further extended upto 30.06.2021.	Regulation 24A of SEBI (LODR)	Not filed within prescribed time.	NSE	Levy of fine	Submitted on 01.07.2021	Rs. 2,360/-.	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	(i) The delay was due to a technical glitch on NEAPS portal on 30.06.2021, which was beyond the control of the Unitech Management. (ii) Suitable reply with "Error Screenshot" was submitted by the Company with the Stock Exchange as proof thereof.	
13.	Submission of Financial Results for the quarter and year ended on 31.03.2021. Due date was 30 th May 2021 which was further extended upto 30.06.2021.	Regulation 33 of SEBI (LODR) Regulations, 2015.	Not filed within prescribed time.	BSE & NSE	Levy of fee	Submitted on 08.06.2022.	Rs. 1,71,100/- each	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management. (ii) It was on account of the inherent legacies that there was delay in finalizing and approving the Financial Results of the Company for the quarter and year ended 31.03.2021. (iii) It is pertinent to mention that all	



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
									<p>the Financial Results upto the FY 2023-24 have already been finalized by the Board of Directors and submitted to the Exchanges.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
14.	Submission of Annual Report for the year ended on March 2021 within the prescribed time (not later than the day of commencement of	Regulation 34 of SEBI (LODR)	-	BSE & NSE	Levy of fine	Submitted on 15.06.2022	Rs. 1,20,360/- each	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020.	(i) Non-compliance was due to delay in holding the AGM for FY 2020-21, which was because of the inherent legacies and severe constraints, which the new Management, appointed with the prior approval of the Hon'ble Supreme Court vide its order	

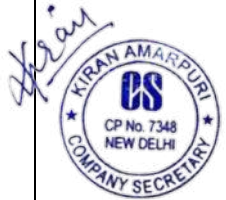


Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
	dispatch to its shareholders).								dated 20.01.2020, inherited from the superseded management and were, therefore, beyond the control of the new Management. (ii) However, the AGM for the said FY was held on 07.07.2022 and the requisite Annual Report was also forwarded to the Members on 15.06.2022 before the said AGM as per the statutory requirement.	
15.	Submission of Financial Results for the quarter ended on 30.06.2021. Due date was 14.08.2021	Regulation 33 of SEBI (LODR) Regulations, 2015;	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 14.09.2022	Rs. 1,71,100/- each	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22 nd January, 2020.	(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management. (ii) It was on account of the inherent legacies and severe constraints beyond the control of the new Management that there was delay in finalizing and approving the Financial Results of the Company for the quarter ended 30.06.2021. (iii) It is pertinent to mention that all the Financial Results upto the FY 2023-24 have already been finalized by the Board of Directors and submitted to the Exchanges.	



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
									<p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
16.	Submission of Corporate Governance Report for the quarter ended on 30.09.2021. Due date was 21.10.2021.	Regulation 27(2) of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 11.01.2023	Rs. 12,69,680/- each	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	(i) The delay in filing Corporate Governance Report in terms of regulation 27 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the quarter ended on 30.09.2021 was because of Annexure-IV not being ready in time. The delay was because of legacy issues and constraints inherited by the new Management.	



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
									<p>(ii) The Corporate Governance Report, however, for the quarter ended on 30.09.2021 has already been submitted on 11.01.2023.</p> <p>(iii) The new Management, which has been appointed by the Union of India, with the prior approval of the Hon'ble Supreme Court vide its order dated 20.01.2020, is fully conscious of its obligations and is committed to make all possible efforts to ensure that filings are made within the prescribed timelines in future.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would,</p>	

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
									therefore, be taken only after the adjudication of the aforesaid IAs.	
17.	Submission of Financial Results for the quarter and half year ended on 30.09.2021. Due date was 14.11.2021	Regulation 33 of SEBI (LODR) Regulations, 2015	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 28.02.2023	Rs. 1,71,100/- each	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22 nd January, 2020.	<p>(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management.</p> <p>(ii) It was on account of the inherent legacies and constraints that there was delay in finalizing and approving the Financial Results of the Company for the quarter and half year ended 30.09.2021.</p> <p>(iii) It is pertinent to mention that all the Financial Results upto the FY 2023-24 have already been finalized by the Board of Directors and submitted to the Exchanges.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in</p>	



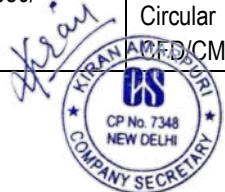
Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
									<p>the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
18.	Submission of Financial Results for the quarter and nine months ended on 31.12.2021 Regulations, 2015. Due date was 14.02.2022.	Regulation 33 of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 28.02.2023	Rs. 1,65,200/- each	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	<p>(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management.</p> <p>(ii) It was on account of the inherent legacies and constraints that there was delay in finalizing and approving the Financial Results of the Company for the quarter and nine months ended 31.12.2021.</p> <p>(iii) It is pertinent to mention that all the Financial Results upto the FY 2023-24 have already been finalized by the Board of Directors and submitted to the Exchanges.</p> <p>(iv) It is further pointed out that on the</p>	



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
									<p>ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
19.	Submission of Financial Results for the quarter and year ended on 31.03.2022. Due date was 30.05.2022.	Regulation 33 of SEBI (LODR) Regulations, 2015	Late Submission	BSE & NSE	Levy of fine	Submitted on 28.02.2023	Rs. 1,77,000/- each	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CI R/P/2020/12 dated 22 nd January, 2020.	<p>(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management.</p> <p>(ii) It was on account of the inherent legacies and severe constraints that there was delay in finalizing and approving the Financial Results of the Company for the</p>	




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
									<p>quarter and year ended 31.03.2022.</p> <p>(iii) It is pertinent to mention that all the Financial Results upto FY 2023-24 have already been finalized by the Board of Directors and submitted to the Exchanges.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
20.	Submission of Secretarial Compliance Report. Due date was	Regulation 24A of SEBI (LODR) Regulations,	Late Submission	BSE	Levy of fine	Report in PDF format was submitted on	Rs. 7,080/-	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/20201	(i) Suitable reply regarding the filing of Secretarial Compliance Report on 25.05.2022 i.e. before the Due Date through XBRL mode has	



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
	30.05.2022	2015				02.06.2023.		2 dated 22 nd January, 2020.	been submitted with BSE Ltd.	
21.	Submission of Corporate Governance Report for the quarter ended on 31.03.2022. Due date was 21.04.2022	Regulation 27(2) of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 11.01.2023	Rs. 68,440/- each	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CI R/ P/2020/12 dated 22 nd January, 2020.	<p>(i) The delay in filing Corporate Governance Report in terms of regulation 27 of SEBI (LODR) Regulations, 2015 for the quarter and half year ended 31.03.2022 was because of Annexure-IV not being ready in time. The delay was because of legacy issues and constraints inherited by the new Management from the superseded Management.</p> <p>(ii) However, the Corporate Governance Report has already been submitted to BSE on 11.01.2023.</p> <p>(iii) The Management, which has inherited various legacies and constraints, is fully conscious of its obligations and is committed to make all possible efforts to ensure that filings are made within the prescribed timelines in future.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in</p>	



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
									<p>the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
22.	Submission of Financial Results for the quarter ended on 30.06.2022. Due date was 14.08.2022	Regulation 33 of SEBI (LODR) Regulations, 2015	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 21.12.2023 	Rs. 1,71,100/- each.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22nd January, 2020.	<p>(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management.</p> <p>(ii) It was on account of the inherent legacies that there was delay in finalizing and approving the Financial Results of the Company for the quarter ended 30.06.2022.</p> <p>(iii) It is pertinent to mention that all the Financial Results upto the FY 2023-24 have already been finalized by the Board of Directors</p>	

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
									<p>and submitted to the Exchanges.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
23.	Submission of Corporate Governance Report for the quarter ended on September 2022.	Regulation 27(2) of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 12.01.2023	Rs. 66,080/- each. Reminder letter dated 07.12.2022 from NSE of same amount with a remark that the fine will keep on increasing every day till the date of compliance is	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22nd January, 2020.	(i) The delay in filing Corporate Governance Report in terms of Regulation 27 of SEBI (LODR) Regulations, 2015 for the quarter and half year ended 30.09.2022 was because of Annexure-IV not being ready in time. The delay was because of legacy issues and constraints inherited by the new Management from the	



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
						<p>achieved. Reminder email dated 07.12.2022 from BSE is also received for fine of Rs. 1,06,200/-.</p>			<p>superseded Management.</p> <p>(ii) However, the same has now been submitted to NSE and BSE on 12.01.2023.</p> <p>(iii) The new Management, which has inherited various legacies and constraints, is fully conscious of its obligations and is committed to make all possible efforts to ensure that filings are made within the prescribed timelines in future.</p> <p>(iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	



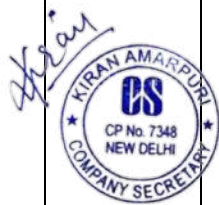
Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
24.	Submission of the Financial Results for the quarter ended on September 2022. Due date was 14.11.2022	Regulation 33 of SEBI (LODR)	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 29.08.2023	Rs. 1,77,000/- each.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22 nd January, 2020.	<ul style="list-style-type: none"> (i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management. (ii) It was on account of the inherent legacies that there was delay in finalizing and approving the Financial Results of the Company for the quarter and half year ended 30.09.2022. (iii) It is pertinent to mention that all the Financial Results upto the FY 2023-24 have already been finalized by the Board of Directors and submitted to the Exchanges. (iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid 	



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
									<p>IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
25.	Submission of Annual Report for the year ended on March 2022. Due date was 08.03.2023	Regulation 34 of SEBI (LODR)	Late Submission .	BSE & NSE	Levy of fine	Submitted on 9 th March, 2023.	Rs. 94,400/- each.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	<p>(i) The Annual Audited Financial Statements for the FY 2021-22 of the Company were approved on 28.02.2023 and, thereafter, the Annual General Meeting of the Company for the FY 2021-22 was also held on 31.03.2023.</p> <p>(ii) The Annual Report for the year ended on 31st March 2022 was accordingly submitted to the BSE & NSE on 09.03.2023 (as 8th March, 2023 was a holiday on account of Holi Festival).</p> <p>(iii) The new Management, which has inherited various legacies and constraints, is fully conscious of its obligations and is committed to make all possible efforts to ensure that filings are made within the prescribed timelines in future.</p> <p>(iv) The Management would further</p>	



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
									like to state that the last AGM of the Company for the FY ended 31.03.2023 was held within the prescribed timelines i.e. on 29.09.2023 and the annual report was also submitted on time.	
26.	Submission of the Financial Results for the quarter ended on December 2022. Due date was 14.02.2023	Regulation 33 of	Not filed within prescribed time.	BSE & NSE	Levy of fine	Submitted on 29.08.2023	Rs. 1,65,200/- each.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22 nd January, 2020.	<ul style="list-style-type: none"> (i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management. (ii) It was on account of the inherent legacies and severe constraints that there was delay in finalizing and approving the Financial Results of the Company for the quarter and nine months ended 31.12.2022. (iii) It is pertinent to mention that all the Financial Results upto the FY 2023-24 have already been finalized by the Board of Directors and submitted to the Exchanges. (iv) It is further pointed out that on the ground of inherent legacies and other constraints, the new Management has also filed IAs 	



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
									<p>bearing Nos. 81660/ 2021 and 81663/ 2021 dated 15.07.2021 in the Hon'ble Supreme Court, for various reliefs and concessions, among others, as mentioned in the Prayer Clause of the aforesaid IAs, as mentioned in Management Response at Sr. No. 3.</p> <p>(v) The necessary action about the payment of fine in terms of SEBI Master Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22nd January, 2020 would, therefore, be taken only after the adjudication of the aforesaid IAs.</p>	
27.	Being one of the top one thousand listed entities based on market capitalization, Business Responsibility Report is required to be enclosed with Annual report for the period ended on 31.03.2021.	Regulation 34(2)(f) of SEBI LODR	Not attached	NSE	-	Not Disclosed	-	The Company was required to submit the Report.	<p>(i) When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management.</p> <p>(ii) The new Management, however, has managed to submit the Business Responsibility and Sustainability Report for the FY 2021-22 as a part of the Annual Report for the year ended on 31.03.2022.</p>	



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
									(iii) The new Management is fully conscious of its obligations and is committed to make all possible efforts to ensure that filings are made within the prescribed timelines in future.	



Additional Affirmations to be given to the BSE & NSE by the Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR), pursuant to Notice No. 20230316-14 and Circular Reference No. NSE/CML/2023/21 dated March, 16, 2023

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	No remarks are required
2.	Adoption and timely updation of the Policies: 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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes	<i>Policies are required to be aligned with requirements of national and/or International standards of Business Responsibility & Sustainability Reporting</i>
3.	Maintenance and disclosures on Website: 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	No remarks are required
4.	Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	No remarks are required.
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes Yes	Compliances related to one of the material subsidiaries of the Company is pending for want of appointment of Independent Director on its Board.
6.	Preservation of Documents: 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	No remarks are required.
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	No	<i>Performance evaluation of Directors and Independent Directors and Committees have not been conducted</i>
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	No remarks are required



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
	(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.		
9.	Disclosure of events or information: 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	No remarks are required
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	No remarks are required
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been 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 except as provided under separate paragraph herein (**).	No	<i>Various notices have been issued by both the Stock Exchanges are required to be complied</i>
12.	Additional Non-compliances, if any	NA	<i>No additional non-compliance observed for any SEBI regulation/circular/ guidance note etc.</i>



Compliances related to resignation of statutory auditors from listed entities and material subsidiaries as per SEBI Circular CIR/CFD/CMD/114/2019 dated 18th October, 2019;

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year</p>	NA	None
2.	Other conditions relating to resignation of Statutory Auditor		
	<p>Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p>The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>Disclaimer in case of non-receipt of information:</p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>	NA	None
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	NA	None

Place: New Delhi

Date:30.05.2024

UDIN: F006756F000499160



(CS Kiran Amarपुरi)

FCS No.:6756

C P No.:7348