

Date: 23th May 2022

To

The National stock Exchange of India Limited

Exchange Plaza

Plot no. -C/1, G Block

Bandra-Kurla Complex

Bandra (E)

Mumbai-400051

Scrip Code: PANSARI

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2022

Reg: Regulation 24(A) of the SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 24(A) of the SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith 'Annual Secretarial Compliance Report for the year ended March 31, 2022, duly certified by Prakash Kumar Shaw, practicing Company Secretary.

Kindly take the aforesaid report on record

Thanking You

Yours faithfully

For Pansari Developers Limited

For PANSARI DEVELOPERS LIMITED

Jaya Singh

Company Secretary

Jaya Singh

Company Secretary

Mem No. : A60035



Secretarial Compliance Report of Pansari Developers Limited
for the year ended 31st March, 2022

I, Prakash Kumar Shaw, *Practicing Company Secretary*, have examined:

- (a) all the documents and records made available to me and explanation provided by **Pansari Developers Limited** (CIN : L72200WB1996PLC079438) having its Registered Office at 14, N S Road, 4th Floor, Kolkata – 700001, West Bengal (“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, 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, as amended, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (e) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;

and circulars/ guidelines issued thereunder; and based on above examination, I hereby report that, during the Review Period:





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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:-

Sl. No.	Compliance Requirement (Regulations/ circulars/guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
1.	Regulation 30 (1) and 30 (2) of SEBI SAST Regulations 2011, as on March 31, 2021 –	Delay in submission of disclosure under Regulation 30 (1) and 30 (2) of SEBI SAST Regulations 2011, as on March 31, 2021.	Disclosure under Regulation 30 (1) and 30 (2) of SEBI SAST Regulations 2011, as on March 31, 2021 was submitted on 13.04.2021 after the due date which was 07.04.2021.
2.	SEBI (Prohibition of Insider Trading) Regulations, 2015–	Delay/Non submission of intimation of Trading Window closure pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015.	Intimation for closure of Trading Window for the quarter ended 31.03.2021 has been given on 11.05.2021 after the due date which was 31.03.2021 and have not submitted for rest of the quarter / half year period of the Financial Year 2021-22.
3.	Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015–	Financial results submitted for the year / half year ended 31.03.2021 is not as per format prescribed by SEBI.	The query raised by National Stock Exchange of India Ltd. that Financial results submitted for the year / half year ended 31.03.2021 is not as per format prescribed by SEBI for which the Company has suitably replied on 12.07.2021.

- (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 my examination of those records.





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- (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:

Sl. No.	Action taken by	Details of Violation	Details of Action taken E.g. fines, warning letter, debarment, etc.	Observations/ Remarks of the Practising Company Secretary, if any.
-	-	None	-	-

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable

Place : Kolkata
Date : 19.05.2022



Prakash Shaw
(CS PRAKASH KUMAR SHAW)
Practicing Company Secretary
ACS - 32895 / CP No.- 16239
UDIN: A032895D000350731