



Creation, not construction.

To,
The Assistant Manager,
National Stock Exchange of India Limited Listing
Department,
'Exchange Plaza', Bandra Kurla Complex,
Bandra (East),
Mumbai – 400051

To,
The General Manager,
BSE Limited
Corporate Relationship Department,
1st floor, Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400001

30 May 2019

Sub.: Annual Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended March 31, 2019

**Ref: NSE Symbol and Series: KOLTEPATIL and EQ
BSE Code and Scrip Code: 9624 and 532924**

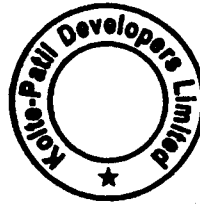
Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report for the year ended March 31, 2019.

This is for your information and record.

For Kolte-Patil Developers Limited

**Vinod Patil
Company Secretary and Compliance Officer
Membership No. A13258**



KOLTE-PATIL DEVELOPERS LTD.

CIN : L45200PN1991PLC129428

Pune Regd Off : 2nd Floor, City Point, Dhole Patil Road, Pune - 411 001. Maharashtra, India Tel.: +91 20 6622 6500 Fax : +91 20 6622 6511
Bangalore Off : 121, The Estate Building, 10th floor, Dickenson Road, Bangalore - 560042 . India Tel.: 80 - 4662 4444 / 2224 3135 / 2224 2803 Web : www.koltepatil.com

**SECRETARIAL COMPLIANCE REPORT OF KOLTE-PATIL DEVELOPERS LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2019**

To,
Kolte-Patil Developers Limited
2nd Floor, City Point,
Dhole Patil Road, Pune 411001

We, **SVD & Associates**, have examined:

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

for the year ended 31st March, 2019 ("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 (LODR);
- b) Securities and Exchange Board of India -(Issue of Capital and Disclosure Requirements), Regulations, 2009 (till 8th November 2018) and The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 effective from 09th November, 2018 (**not applicable to the listed entity during the Review Period**);
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



- d) The Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 1998 (till 10th September, 2018) and The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 effective from 11th September, 2018 **(not applicable to the listed entity during the Review Period)**;
- 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 **(not applicable to the listed entity during the Review Period)**;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(not applicable to the listed entity during the Review Period)**;
- h) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client to the extent of the securities issued **(not applicable to the listed entity during the Review Period)**;
- i) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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
1	Regulation 30 read with clause 14 of Para A of Part A of Schedule III of LODR, requires listed entity to intimate to Stock Exchange(s) amendments made to Memorandum of Association and Articles of Association of the listed entity in brief.	The Corporate Announcement to the Stock Exchanges for amendments to Capital Clause of Memorandum of Association and adoption of new set of Articles of Association, carried out through Postal Ballot dated 22nd March 2019 is made on 30 th May 2019, which is beyond the prescribed period of twenty four hours.	Stock exchange Intimation as detailed was filed beyond the prescribed timeline under respective Regulation.
2	Regulation 47 (2) of LODR requires listed entity to give reference to link of the website of the listed entity and Stock Exchange(s) where further details are available as regards the publications that are made under regulation 47 (1).	In the information published, the listed entity has not made any reference to link of the website of the listed entity and the Stock Exchanges where further details are available as regards the publications that are made under regulation 47 (1) (a).	The listed entity needs to ensure the compliance to the extent of deviation reported.



(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
1.	Bombay Stock Exchange (BSE) and National Stock Exchange (NSE)	Delay in furnishing prior intimation of meeting of Board of Directors as per the provisions of Regulation 29(2) /29(3)	Fine of Rs. 11,800/- is levied by BSE and NSE. The said fine is paid by the listed entity. Details for same are as follows: BSE: 25.04.2019 NSE: 25.04.2019	The matter is closed.

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...(The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	NA	NA	NA	NA

Place: Pune
Date: May 30, 2019

For SVD & Associates
Company Secretaries



Sridhar

Sridhar Mudaliar
Partner
FCS No: 6156
C P No: 2664