| 3P  | 3P LAND HOLDINGS LIMITED<br>[Formerly known as Pudumjee Industries Limited]  |
|---|--|
| LAND  | Registered Office  |
| JWP:33  | 22 <sup>nd</sup> May, 2019   |
| The Manager,<br>Listing Department,<br><b>BSE Limited,</b><br>Phiroze Jeejeebhoy Towers,<br>Dalal Street,<br>Mumbai – 400001.<br>Scrip Code: 516092 | The Manager,<br>Listing Department,<br><b>National Stock Exchange of India Ltd.,</b><br>Exchange Plaza, 5 <sup>th</sup> Floor,<br>Plot No. C/1, G Block,<br>Bandra Kurla Complex,<br>Bandra (E),<br>Mumbai – 400051. |
|   | Scrip Code: 3PLAND   |

Dear Sir,

Sub: Annual secretarial Compliance Report for the Financial Year 2018-19.

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, we have enclosed Annual Secretarial Compliance Report dated 14<sup>th</sup> May, 2019, issued by Mr. P. N. Parikh of Parikh & Associates, Practicing Company Secretaries for the Financial Year 2018-19 for your information and records.

Thanking you,

For 3P LAND HOLDINGS LTD., [Formerly known as Pudumjee Industries Ltd.]

(J. W. Patil) Company Secretary. Encl: A/a.



## **Registered Office:**

Thergaon, Chinchwad, Pune-411033 Tel: +91-20-30613333, Fax : +91-20-3061 3388 E-Mail : <u>sk@pudumjee.com</u>. CIN L74999MH1999PLC013394 GSTIN:-27AAACP0487B1ZQ **Corporate Office:** 

Jatia Chambers, 60, Dr. V.B.Gandhi Marg, Kalaghoda. Mumbai-400001 India. Tel: +91-22-30213333, 22674485, 66339300, Fax: +91-22-22658316. E-Mail: <u>pudumjee@pudumjee.com</u> Web Site : www.pudumjeeindustries.com.

## PARIKH & ASSOCIATES COMPANY SECRETARIES

Office :

111, 11th Floor, Sai-Dwar CHS Ltd, Sab TV Lane, Opp Laxmi Industrial Estate Off Link Road, Above Shabari Restaurant, Andheri (W), Mumbai : 400 053 Tel. : 26301232 / 26301233 / 26301240 Email : cs@parikhassociates.com parikh.associates@rediffmail.com

Secretarial Compliance Report of 3P Land Holdings Limited for the year ended March 31, 2019

To, 3P LAND HOLDINGS LIMITED (Formerly known as Pudumjee Industries Limited) Thergaon, Chinchwad, Pune - 411033

We Parikh & Associates have examined:

- a) all the documents and records made available to us and explanation provided by 3P Land Holdings 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 March 31, 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;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable to the company during the review period)
- 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 to the company during the review period)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the company during the review period)



- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the company 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 company during the review period)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India(Depositories and Participant) 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, <u>except</u> in respect of matters specified below:-

| Sr. No. | Compliance Requirement<br>(Regulations / circulars/<br>guidelines including specific<br>clause) | Deviations | Observations/<br>Remarks of the<br>Practicing<br>Company Secretary |
|---------|---|------------|--|
|         |   |            |  |

- 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 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<br>violation | Details of action<br>taken E.g. fines,<br>warning letter,<br>debarment, etc. | Observations/<br>remarks of the<br>Practicing<br>Company<br>Secretary, if any. |
|---------|-----------------|-------------------------|--|--|
|         |                 |                         |  |  |



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

| Sr. No. | Observations of<br>the Practicing<br>Company<br>Secretary in the<br>previous reports | Observations<br>made in the<br>secretarial<br>compliance report<br>for the year ended<br> | Actions taken by<br>the listed entity,<br>if any | Comments of the<br>Practicing<br>Company<br>Secretary on the<br>actions taken by<br>the listed entity |
|---------|--|---|--|---|
|         |  | Not Applica   | ble  |   |



For Parikh & Associates

Place: Mumbai Date: May 14, 2019

Name of the Practicing Company Secretary: P.N.Parikh FCS No.: 327 CP No.: 1228