

Secretarial Compliance Report of 3P Land Holdings Limited for the year ended March 31, 2021

**To,**  
**3P LAND HOLDINGS 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, 2021 ("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 and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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.	As per Regulation 17(1) (c) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), the composition of the Board of Directors should consist of minimum six Directors.	The constitution of the Board did not comprise of six Directors as required under regulation 17(1) (c) of the SEBI Listing Regulations during the quarter June, 2020 and September, 2020	The Company has paid necessary fine levied by National Stock Exchange of India Limited.

- 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 violation	Details of action taken E.g. fines, warning letter, debarment, etc.		Observations/ remarks of the Practicing Company Secretary, if any.
1.	National Stock Exchange of India Limited ("NSE")	The constitution of the Board did not comprise of six Directors as required under regulation 17(1) (c) of the SEBI Listing Regulations during the quarter June, 2020 and September, 2020	Date of fine imposed	Fine imposed by NSE (Rs.)	The Company has paid the fine levied by NSE
			20.08.2020	4,55,000/-	
			17.11.2020	3,10,000/-	

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended .....	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
		<i>(The years are to be mentioned)</i>		
Not Applicable				

For Parikh & Associates

Place: Mumbai  
Date: May 24, 2021

Signature:

Name of the Practicing Company Secretary: Shalini Bhat  
FCS No.: 6484 CP No.:6994  
UDIN: F006484C000360411