

May 20, 2026

Scrip Code: 976372 | 977226 | 977440 | 977736
BSE Limited
Wholesale Debt Market Segment
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400001

Sub: Compliance under Regulation 54 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”)

Dear Sirs,

Pursuant to Regulation 54 of the SEBI LODR Regulations, as amended, read with applicable SEBI circular, we enclose herewith a certificate on security cover, issued by the statutory auditors of the Company, for securing the debt securities of the Company, during the quarter ended March 31, 2026.

Please take the same on your record.

Thanking you,

Yours faithfully,
For **Lucina Land Development Limited**

Yash Garg
Company Secretary

LUCINA LAND DEVELOPMENT LIMITED

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GARUD & Associates

CHARTERED ACCOUNTANTS

Independent Auditor's Report on Asset Cover as at 31 March 2026 under Regulation 54 read with Regulation 56(1)(d) of the Securities and Exchange Board of India (listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) for submission to the BSE Limited and IDBI Trusteeship Services Limited (the "Debenture Trustee")

To
Board of Directors
Lucina Land Development Limited
Office No. 202, 2nd floor,
A-18, Rama House, Middle Circle,
Connaught Place, New Delhi - 110001

1. This report is issued in accordance with our master engagement letter.
2. We GARUD & Associates (Formerly Known as Raj Girikshit & Associates), Chartered Accountants, are the Statutory Auditors of the Company and have been requested by the Company to examine the accompanying Statement showing 'Asset Cover' for the listed non-convertible debt securities as at 31 March 2026 (the "Statement") which has been prepared by the Company from the audited financial statements and other relevant records and documents maintained by the Company as at and for the year ended 31 March 2026 pursuant to the requirements of the Regulation 56(1)(d) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, (the "SEBI Regulations"), and has been initiated by us for identification purpose only.

This Report is required by the Company for the purpose of submission with IDBI Trusteeship Services Limited (the "Debenture Trustee") of the Company and to the BSE Limited to ensure compliance with the SEBI Regulations and SEBI Circular SEBI/IO/MIRSD/MIRSO_CRADT/CIR/P/2022/67 dated 19 May 2022 ("the circular") in respect of its listed non-convertible debt securities as at 31 March 2026 ("Debentures"). The Company has entered into agreement(s) with the Debenture Trustee ("Debenture Trust Deed") in respect of such Debentures, as indicated in the Statement. This report is being issued in furtherance to our earlier report dated 20th May 2026 in which the Statement attached covers only the mortgaged assets owned by the Company and not covered all the assets whether owned by the Company or not and which are mortgaged against the listed non-convertible debentures issued by the Company. Thus, we are attaching herewith the revised Statement which covers all the mortgaged assets whether owned by the Company or not, against the non-convertible debentures issued by the Company.



Guardian In financial matters
Accountable to commitment
Robust solutions
Uniformity In deliverables
Disciplined in all we do

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Kiran Building, KG Marg,
New Delhi - 110001

Management's Responsibility on the Statement

3. The preparation of the accompanying Statement including preparation and maintenance of all accounting and other relevant supporting records and documents is solely the responsibility of the management of the Company. This responsibility includes the design, implementation and maintenance of internal controls relevant to the preparation and presentation of the Statement, and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.
4. The management is also responsible for ensuring compliance with the relevant requirements of the SEBI Regulations, SEBI Circulars, Companies Act, 2013 and other Applicable Laws and Regulations for the purpose of furnishing the Statement and for providing all other relevant information to the Trustee.
5. The Management is also responsible to ensure that Assets Cover Ratio as on 31 March 2026 is in compliance with SEBI circular no. SEBI/HO/MIRSD/MIRSD_CRADT/CIR/P/2022/67 dated 19 May 2022 with the minimum asset cover requirement of hundred percent as per the SEBI Regulations as given in Annexure I attached to this certificate.

Auditor's Responsibility

6. Our responsibility, for the purpose of this certificate is to verify the particulars contained in the Statement, on the basis of the audited financial statements and other relevant records and documents maintained by the Company and to certify asset cover ratio is minimum hundred percent as per the minimum requirement stated in SEBI Regulations.
7. We have audited the Financial Results for the year ended 31 March 2026, prepared by the Company pursuant to the requirements of Regulation 52 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, and issued an unmodified conclusion dated 20th May 2026. Our audit of these financial results for the year ended 31 March 2026 was conducted in accordance with the Standards on Auditing specified under section 143(10) of the Companies Act, 2013.
8. We conducted our examination of the Statement in accordance with the Guidance Note on Reports or Certificates for Special Purposes issued by the ICAI. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the ICAI.
9. We have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, "Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements".
10. Our scope of work did not involve us performing audit tests for the purposes of expressing an opinion on the fairness or accuracy of any of the financial information or the financial results of the Company taken as a whole. We have not performed an audit, the objective of which would be the expression of an opinion on the financial results, specified elements, accounts or items thereof, for the purpose of this report. Accordingly, we do not express such opinion.
11. A limited assurance engagement includes performing procedures to obtain sufficient appropriate evidence on the applicable criteria, mentioned in paragraph 6 above. The procedures performed vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Accordingly, we have performed the following procedures in relation to the Statement:



- (a) Obtained and read the Debenture Trust Deed and the Information Memorandum in respect of the secured Debentures and noted the asset cover percentage required to be maintained by the Company in respect of such Debentures, as indicated in Annexure I of the Statement.
 - (b) Traced and agreed the principal amount of the Debentures outstanding as on 31 March 2026 to the audited financial statement of the Company and audited books of account maintained by the Company as at 31 March 2026;
 - (c) Obtained and read the particulars of asset cover required to be provided in respect of Debentures as indicated in the Debenture Trust Deed and the Information Memorandum.
 - (d) Obtained certificates dated 19th May 2026 from the Statutory Auditor of fellow subsidiaries with respect of book values of assets being offered as security;
 - (e) Traced the value of assets indicated in Annexure I of the Statement to the audited financial statements of the Company and audited books of account maintained by the Company as on 31 March 2026.
 - (f) Obtained the list of security created in the register of charges maintained by the Company and 'Form No. CHG-9' filed with Ministry of Corporate Affairs. Traced the value of charge created against assets to the asset cover.
 - (g) Obtained the list and value of assets placed under lien or encumbrance for the purpose of obtaining any other loan and determined that such assets are not included in the calculation of asset cover in respect of the Debentures.
 - (h) Examined and verified the arithmetical accuracy of the computation of asset cover indicated in Annexure I of the Statement.
12. We have no responsibility to update this certificate for events and circumstances occurring after the date of this certificate.

Conclusion

13. Based on our examination and the procedures performed by us, as referred to in paragraph 11 above, evidence obtained, and the information and explanations given to us, along with the representations provided by the management and based on consideration of certificates from statutory auditors of fellow subsidiaries as considered in the Statements, in our opinion, the details included in the accompanying Statements regarding book values of the assets offered as security against listed debt securities of the Company outstanding as at 31 March 2026 have been accurately extracted from the audited financial statements of the Company, underlying books of account and other relevant records and documents maintained by the Company, and the certificates of statutory auditors of fellow subsidiaries for the year ended 31 March 2026, nothing has come to our attention that causes us to believe that the Company has not maintained hundred percent asset cover or asset cover as per the terms of the Information Memorandum and Debenture Trust deed.

Other matter

14. The book value of secured assets of fellow subsidiaries which are given as security as per the Debenture trust deed dated 12 March 2026 as mentioned in paragraph 10 (d) above has been certified by Walker Chandiook & Co LLP (the Statutory Auditors of fellow subsidiaries) vide their certificates dated 19 May 2026, which has been provided to us by the management and relied upon by us for the purpose of our examination of the Statements. Our opinion is not modified in respect of this matter.



Restriction on use

15. The Report has been issued at the request of the Company, solely in connection with the purpose mentioned in paragraph 2 above and to be submitted with the accompanying Statement to the BSE Limited and Debenture Trustee and is not to be used or referred to for any other person. Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this report is shown or into whose hands it may come. We have no responsibility to update this certificate for events and circumstances occurring after the date of this report.

For GARUD & Associates

(Formerly Known as Raj Girikshit & Associates)

Chartered Accountants

Firm's Registration No: 022280N


Gaurav Goyal

Partner

Membership No: 518698

Place: New Delhi

Date: 20th May 2026

UDIN: 26518698SHJOMF3917



Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L	Column M	Column N	Column O
	Exclusionary Charge	Exclusionary Charge	Exclusive Charge	Part-passu Charge	Part-passu Charge	Part-passu Change	Part-passu Change	Part-passu Change	Total (C to H)	Market Value for Assets Charged on Exclusive basis	Carrying /book value for exclusive charge assets where market value is not ascertainable or applicable (For E.g. Bank Balances, DERA market value is not applicable)	Market Value for Part passu change Assets	Carrying value/book value for part passu change assets where market value is not ascertainable or applicable (For E.g. Bank Balances, DERA market value is not applicable)	Total Value (A&K+L+M+N)
Particulars	Debit for which this certificate is being issued	Debit for which this certificate is being issued	Other Secured Debt	Debit for which this certificate is being issued	Assets Shared by part passu debt holder for which certificate is issued in other debt with part passu charge	Other assets in which there is part-passu (excluding items covered in column F)	Assets not offered as security	Elimination (amount in negative)						
ASSETS	Book Value	Book Value	Book Value	Yes/No	Book Value	Book Value								
Property, plant and equipment	-	-	-	-	-	-	11.42	-	11.42	-	-	-	-	-
Capital work-in-progress	-	-	-	-	-	-	4.94	-	4.94	-	-	-	-	-
Intangible assets	-	-	-	-	-	-	1.55	-	1.55	-	-	-	-	-
Other financial assets	-	-	-	-	-	-	23.75	-	23.75	-	-	-	-	-
Deferred tax assets (net)	-	-	-	-	-	-	2.02	-	2.02	-	-	-	-	-
Non-current tax assets (net)	-	-	-	-	-	-	201.99	-	201.99	-	-	-	-	-
Inventory	13,052.86	13,052.86	-	-	-	-	829.02	-	13,032.86	2,682.20	-	-	-	2,682.20
Investments*	137.58	137.58	-	-	-	-	15.70	-	139.08	-	-	-	-	139.08
Trade receivables**	46.95	46.95	-	-	-	-	313.41	-	46.95	-	-	-	-	46.95
Cash and cash equivalents	-	-	-	-	-	-	1,412.21	-	206.49	-	-	-	-	206.49
Other bank balances	-	-	-	-	-	-	5.91	-	6.91	-	-	-	-	6.91
Loans	-	-	-	-	-	-	1,412.21	-	829.02	-	-	-	-	829.02
Other non-current assets	-	-	-	-	-	-	15.70	-	15.70	-	-	-	-	15.70
Other current assets	-	-	-	-	-	-	313.41	-	313.41	-	-	-	-	313.41
Other current assets	-	-	-	-	-	-	1,412.21	-	14,644.76	2,682.20	-	-	-	14,644.76
Others	-	-	-	-	-	-	5,995.79	-	5,995.79	-	-	-	-	5,995.79
Total	5,237.39	5,237.39	-	-	-	-	9,621.15	-	9,621.15	-	-	-	-	9,621.15
Liabilities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Debt securities to which this certificate pertains	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other debt changing part-passu charge with above debt	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other Debt	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Subordinated debt	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Borrowings	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bank	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Others	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Trade payables	-	-	-	-	-	-	-	-	564.49	-	-	-	-	564.49
Lease liabilities	-	-	-	-	-	-	-	-	327	-	-	-	-	327
Provisions	-	-	-	-	-	-	-	-	187.03	-	-	-	-	187.03
Others	-	-	-	-	-	-	-	-	9,817.45	-	-	-	-	9,817.45
Total	5,495.79	5,495.79	2.41	-	-	-	10,572.24	-	25,686.19	-	-	-	-	25,686.19
Cover as Book value**	2.41	2.41	2.41	-	-	-	-	-	-	-	-	-	-	-
Cover as Market value	-	-	-	-	-	-	-	-	-	-	-	-	-	-

* The market value of inventory is ₹ 3,030.30 million which is on the basis of certified valuation done on 07 November 2024

** Assets considered for part-passu charge is calculated on the basis of asset-wise commitment as per respective information memorandum for securities and as per sanction of loans.


Note - Inventory pledged related to below companies -

* The market value of inventory of Crea Properties Limited is ₹ 3,030.30 million which is on the basis of certified valuation done on 07 Nov 2024

** The market value of inventory of RGB Construction Private Limited is ₹ 3,030.30 million which is on the basis of certified valuation done on 07 Nov 2024

The shares of the company have been pledged by the Holding company for this debt facility.

Subordinated debt depicts group inter-company borrowings which are not backed by any security but are subordinated.

For and on behalf of the Board of Directors

 M. Ramanaathan
 Managing Director
 Whole Time Director



CITRA PROPERTIES LIMITED

Annexure 1:

To the statement as mentioned in the Asset Cover Certificate of Lucina Land Development Limited dated 20 May 2026:

Assets	Area (In Acres)	Market Value (in Rs Millions) As per valuation dated 12 th November 2024	Book Value (in Rs Millions) As on 31 March 2026	Nature
Land	5.90	8,635.50	2,426.58	Secured by First ranking charge/mortgage/hypothecation on all that pieces or parcels of land/properties/immovable/movable properties/book debt.

For Citra Properties Limited



AMIT ROSHAN BHAGAT
Director

CITRA PROPERTIES LIMITED

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RGE CONSTRUCTIONS AND DEVELOPMENT LIMITED
(formerly known as RGE Constructions and Development Private Limited)

Annexure 2:

To the statement as mentioned in the Asset Cover Certificate of Lucina Land Development Limited dated 20 May 2026:

Assets	Area (In Acres)	Market Value (in Rs Millions) As per valuation dated 12 November 2024	Book Value (In Rs Millions) As on 31 March 2026	Nature
Land	25	3,748.20	2,345.38	Secured by First ranking charge/mortgage/hypothecation on all that pieces or parcels of land/properties/immovable/movable properties/book debt.

For RGE Constructions and Development Ltd.

Mohit Singh
Director



RGE CONSTRUCTIONS AND DEVELOPMENT LIMITED
(formerly known as RGE Constructions and Development Private Limited)

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SION EDEN DEVELOPERS LIMITED (Formerly Sion Eden Developers Private Limited)

Annexure 3:

To the statement as mentioned in the Asset Cover Certificate of Lucina Land Development Limited dated 20 May 2026:

Assets	Area (In Acres)	Market Value (In Rs Millions) As per valuation dated 08 th October 2024	Book Value (in Rs Millions) As on 31 March 2026	Nature
Land	31.30	6,668.20	4,999.95	Secured by First ranking charge/mortgage/hypothecation on all that pieces or parcels of land/properties/immovable/movable properties/book debt.

For Sion Eden Developers Ltd.


ASHISH KUMAR
Director



SION EDEN DEVELOPERS LIMITED (Formerly Sion Eden Developers Private Limited)

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