

To
The Manager Listing Compliances,
BSE Limited
P.J. Towers, Dalal Street,
Mumbai- 400 001

May 30, 2022

Dear Sirs,

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

**Ref: SEBI Circular No CIR/CFD/CMD1/27/2019 dated February 8, 2019
Scrip Code: 959411, 959412, 973119, 973120 and 973361.**

As you are aware all listed entities on an annual basis are required to arrange to conduct a verification by a Practicing Company Secretary (“PCS”) on compliance of all applicable SEBI Regulations and circulars issued thereunder, consequent to which, the PCS shall submit the Annual Secretarial Compliance Report (ASCR) in the manner and format specified in the SEBI circular mentioned above. The listed entity shall submit the ASCR to the stock exchanges within 60 days of the end of the financial year in the manner specified in the SEBI circular mentioned above.

Accordingly, we wish to inform you that the Company has received the Annual Secretarial Compliance Report (ASCR) for the Financial Year 2021-22 from Mr. Prakash M, Practicing Company Secretary in the format stipulated in the Circular issued by SEBI referred to above.

We wish to inform you that the said ASCR dated May 30th, 2022 was placed and was taken note of at the meeting of the Board of Directors of the Company held on May 30, 2022.

We are submitting the said ASCR dated May 30, 2022.

**Thanking you,
For Embassy Property Developments Private Limited**

**Devika Priyadarsini
Company Secretary
M.No.-ACS 49485**

ANNUAL SECRETARIAL COMPLIANCE REPORT

For the Financial Year ended March 31, 2022

Pursuant to the provisions of Regulation 24 (A)(2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2022 and Circular No CIR/CFD/CMD1/27/2019 dated February 8, 2019 Issued by the Securities and Exchange Board of India)

To
The Board of Directors
Embassy Property Developments Private Limited
I Floor, Embassy Point
#150 Infantry Road, Bangalore - 560001

Dear Sir/Madam,

I, Mr. Prakash M, Practicing Company Secretary, have examined:

- a) All the documents and records made available to me and explanation provided by Embassy Property Developments Private Limited [CIN: U85110KA1996PTC020897] having its Registered Office at I Floor, Embassy Point, #150 Infantry Road, Bangalore - 560001 ("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 required which has been relied upon to make this certification.

for the year ended March 31, 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 there under; and
- b) the Securities Contract (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, Circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specified 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 ("SEBI LODR");



- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employees Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And based on the above information, I 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 Practising Company Secretary
1	Company is required to submit un-audited or audited financial results on a quarterly basis in the format as specified by the Board within forty-five days from the end of the quarter under Regulation 52 of SEBI LODR	Company has submitted un-audited financial results for the quarter ended 30 September 2021 with delay	Company has submitted the report under Regulation 52 of SEBI LODR with delay along with payment of penalty
2	Company is required to disclose to the stock exchange in quarterly along with financial statements, the extent and nature of security created and maintained with	Company has submitted report on asset cover for the quarter ended 30 September 2021 with delay	Company has submitted the report under Regulation 54(2) of SEBI LODR with delay along with payment of penalty



	respect to its secured listed non-convertible debt securities under Regulation 54 (2) of SEBI LODR		
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- (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 my examination of those records.
- (c) During the review period, no actions have been taken against the listed entity / its promoters/ directors/material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Instructions issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issued thereunder.
- (d) The listed entity has taken the following actions to comply with the observations made in previous Secretarial Compliance reports :

Sr. No	Observations of the Practising Company Secretary in the previous reports	Observations made in the Secretarial Compliance report for the year ended 31st March 2021	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
NIL				

for M Prakash & Associates
Company Secretaries


(Prakash M)

Proprietor

Certificate of Practice No : 9681

Membership No: FCS 8810

UDIN: F008810D000427690



Place: Bangalore

Date: 30 May, 2022

Note: This report is to be read with my letter of even date which is annexed as ANNEXURE I and forms an integral part of this report.


ANNEXURE I

To
The Board of Directors
Embassy Property Developments Private Limited
I Floor, Embassy Point
#150 Infantry Road, Bangalore - 560001

Our report of even date is to be read along with this letter:

1. Compliance with the provisions of SEBI (Listing Obligations and disclosure Requirements) Regulations, 2015 and the SEBI regulations and Circulars is the responsibility of the management of the Company. My responsibility is to express an opinion on these compliances based on our audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the compliance of SEBI LODR, SEBI regulations and SEBI Circulars. The verification was done on test basis to ensure that correct facts are reflected in the compliance records. I believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Wherever required, I have obtained the management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of SEBI LODR and other SEBI regulations on test basis.
6. The Annual Secretarial Compliance Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

for M Prakash & Associates
Company Secretaries


(Prakash M)

Proprietor

Certificate of Practice No : 9681

Membership No: FCS 8810

UDIN:

Place: Bangalore

Date: 30 May, 2022

