

EMAAR

INDIA

Date : May 27, 2022

To,

The General Manager
Department of Corporate Services
BSE Limited,
Floor 25, P J Towers,
Dalal Street,
Mumbai – 400 001

Re: Scrip Code: 948003 (ISIN - INE451H07332)
Scrip Code: 948005 (ISIN - INE451H07340)
Scrip Code: 948012 (ISIN - INE451H07357)

Sub.: Annual Secretarial Compliance Report for the financial year ended 31st March 2022

Dear Sir,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular no. CIR/CFD/CMDI/27/2019 dated 8th February 2019, please find enclosed Annual Secretarial Compliance Report for the year ended 31st March 2022.

You are requested to take the above information on record please.

Thanking you

Yours faithfully,

For Emaar India Limited

Bharat Bhushan Garg
Company Secretary



EMAAR INDIA LIMITED

(Formerly Emaar MGF Land Limited)

EMAAR BUSINESS PARK, MG ROAD, SIKANDERPUR, SECTOR 28, GURUGRAM - 122002, HARYANA.

TEL.: +91 124 442 1155 | FAX: +91 124 479 3401

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CIN: U45201DL2005PLC133161 | EMAIL: ENQUIRIES@EMAAR-INDIA.COM | WWW.EMAAR-INDIA.COM



In compliance with Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015

Secretarial Compliance Report of Emaar India Limited for the year ended
31st March, 2022

We, Shikha Kathuria & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **Emaar India Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchange(s),
- (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, 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 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 Review Period)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (Not applicable to the Company during Review Period)
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable to the Company during Review Period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the Company during Review Period)
- (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; (Not applicable to the Company during Review Period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (Not applicable to the Company during Review Period) 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, 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 52(5) Non-submission of a Certificate signed by the Debenture Trustee taking note of the contents prescribed under regulation 52(4).	Late Submission	The Company was required to submit the Certificate by June 28, 2021. However, it was submitted on July 21, 2021. Accordingly, a fine of Rs. 1000/- per day of delay amounting to Rs. 27140/- was paid to the BSE Limited.

- (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.	Actions 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.
Not Applicable				

- (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
Not Applicable				



SHIKHA KATHURIA & ASSOCIATES
COMPANY SECRETARIES

*Note: Since the Equity Shares of the Company are not listed, therefore certain provisions of the SEBI (LODR) Regulations became applicable to the Company vide SEBI (Listing Obligations and Disclosure Requirements) (Fifth Amendment) Regulations, 2021, w.e.f. September 07, 2021, regarding applicability of the said regulations to entities which have non – convertible debt securities on 'comply or explain' basis until March 31, 2023.

Thus, the Company is in the process of complying with all the applicable provisions of the regulation, wherever applicable.

For Shikha Kathuria & Associates
Company Secretaries

SHIKHA Digitally signed by
KATHURIA SHIKHA KATHURIA
Date: 2022.05.27
15:50:55 +05'30'

Name: Shikha Kathuria
Membership No.: A50496
CP No: 18459
UDIN: A050496D000406632

Place: Gurugram
Date: 27.05.2022