



**LANDMARK**  
DALMIA GROUP

Landmark Property Development Company Limited  
**Registered Office** : 11th Floor, Narain Manzil,  
23, Barakhamba Road, New Delhi - 110 001  
CIN : L13100DL1976PLC188942

Tel. : (91-11) 43621200  
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Email : info@landmarkproperty.in  
Website : www.landmarkproperty.in

June 25, 2021

<p>The Manager, Department of Corporate Services BSE Limited 1<sup>st</sup> Floor New Trading Ring, Rotunda Building, P J Towers, Dalal Street, Fort, Mumbai-400001 Scrip Code: 533012</p>	<p>The Manager, Listing Department National Stock Exchange of India Ltd "Exchange Plaza" Bandra - Kurla Complex, Bandra (E), Mumbai - 400 051 Ref: LPDC</p>
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**SUB: Annual Secretarial Compliance Report for the year ended  
31st March 2021**

In terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, please find enclosed Annual Secretarial Compliance Report duly issued and signed by a Practicing Company Secretary for the year ended 31st March 2021.

You are requested to take the same on your record.

Thanking you,

Yours faithfully,  
For **Landmark Property Development  
Company Limited**

**(Ankit Bhatia)**  
**Company Secretary**

Encl. As above

**Secretarial Compliance Report  
of Landmark Property Development Company Limited  
for the year ended 31<sup>st</sup> March, 2021**

I, Jayant Gupta, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by Landmark Property Development Company 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 31<sup>st</sup> March, 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (e) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

and circulars/ guidelines issued thereunder;

And based on the above examination, 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 Practicing Company Secretary
1	Payment of annual listing fee and other charges as per Regulation 14 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The annual Listing fee payment to BSE Ltd. was delayed by 2 days i.e. was made on 2nd July, 2020	Payment was delayed due to operational exigencies caused by COVID.
2	Regulation 17(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Board of Directors consisted of only five directors instead of minimum six directors for the period 1st April, 2020 to 31st July, 2020.	The composition of the Board of Directors was not as per the regulation for the period 1st April, 2020 to 31st July, 2020 as the Company was delayed in the process of locating suitable person for the position due to prevailing COVID situation. Thereafter, the composition was as per the regulation.

- (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 my 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:

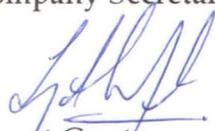


Sr. No.	Actions taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	National Stock Exchange of India Ltd.	Delay in compliance of Regulation 17(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 regarding requirement of having minimum 6 directors on the Board as on 1st April, 2020	Fine of Rs. 5,36,900 (including GST @18%) was imposed vide letter dated 20 <sup>th</sup> August 2020, payable within 15 days of the notice.	The Company was delayed from complying the regulation due to prevailing COVID situation. The Company, having been prevented from meeting the requirement due to factors beyond its control, sought waiver of fine imposed by the stock exchange. The stock exchange granted the waiver of fine to the Company vide letter dated 13 <sup>th</sup> April, 2021.

(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				

For Jayant Gupta & Associates  
Company Secretaries

  
Jayant Gupta  
Company Secretary

FCS No.:7288  
C P No.: 9738  
P R No. : 759/2020  
UDIN: F007288C000502816  
Place: New Delhi  
Date: 23rd June, 2021

