



5th June, 2020

Department of Corporate Services
BSE Limited
P. J. Towers,
Dalal Street,
Mumbai-400001

Dear Sir,

Security Code: 503229

Sub: Annual Secretarial Compliance Report for the period ended 31st March,
2020

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015, as amended, we enclose herewith the Annual Secretarial Compliance Report issued by Taher Sapatwala and Associates, for the year ended 31st March, 2020 for your information and record.

Kindly take the same on record.

Thanking you,

Yours faithfully,
For Simplex Realty Limited

Sd/

Nandan Damani
Managing Director

Encl: as above

CIN-L17110MH1912PLC000351

30, Keshavrao Khadye Marg, Sant Gadge Maharaj Chowk, Mahalaxmi (E), Mumbai – 400011
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Secretarial Compliance Report
of Simplex Realty Limited for the year ended 31st March, 2020

[Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019]

I, Taher Sapatwala, Practicing Company Secretary, have examined:

- a. all the documents and records made available to me and explanation provided by Simplex Realty Limited (the “listed entity”) having Corporate Identification Number L17110MH1912PLC000351] and whose equity shares are listed at BSE Limited with Scrip Code ‘503229’.
- 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 31st March, 2020 [‘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. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (*Not applicable to the Company during the Review Period*);
- c. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (*Not applicable to the Company during the Review Period*);
- e. The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (*Not applicable to the Company during the Review Period*);



Taher S. Sapatwala
FCS, LLB, MBA
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Taher Sapatwala & Associates
Company Secretaries

- f. The 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. SEBI (Depositories and Participants) 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;
- b. The listed entity has maintained proper records under the provisions of the above Regulations and Circulars / guidelines issued there under in so far as it appears from my examination of those records;
- c. There were no actions taken against the listed entity / its promoters / directors / materials subsidiaries either by SEBI or by Stock Exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts / Regulations and circulars / guidelines issued thereunder:
- d. The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period.

Taher Sapatwala

Taher Sapatwala & Associates

Company Secretaries

C.P. No. 16149

UDIN : F008029B000301234

Place : Mumbai
Date : 30th May, 2020

