



**Taher Sapatwala & Associates**  
Company Secretaries

**Taher S. Sapatwala**  
FCS, LLB, MBA  
9768921021 | 9223506612

## ANNUAL SECRETARIAL COMPLIANCE REPORT

### FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2021.

[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]

The Members,  
Simplex Realty Limited  
Mumbai 4000 011

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 on March 31, 2021 ['Review Period'] in respect of compliance with the provisions of:

1. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
2. 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**);





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- 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. The Securities and Exchange Board of India (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 (except for the fines levied by BSE on the Company for late submission of certain documents for the quarter ended 31.03.2020 which were later waived off by BSE considering the request made by the Company; the delay which were on account of pandemic and lockdowns) 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  
Practicing Company Secretary  
FCS: 8029  
C.P. No. 16149



Place : Mumbai  
Date : June 23, 2021

UDIN : F008029C000500059