



POPULAR ESTATE MANAGEMENT LIMITED

Reg. Office : 81, 8th Floor, 'A' Wing, New Youk Tower Opp. Muktidham Derasar, Thaltej ,
S.G. Highway, Ahmedabad-380 054. Gujarat, India. Tele : 079-26858881
Email: popularestatemanagement@yahoo.co.in
CIN : L65910GJ1994PLC023287

DATE: 10/05/2024

To,
The Deputy Manager,
Department of Corporate Services,
Bombay Stock Exchange Limited
Phirozee jeejeebhoy tower,
Dalal Street, Mumbai-400001.

REF: SCRIP CODE NO. 531870

ISIN: INE370C01015

Dear Sir/Madam,

**SUB: ANNUAL SECRETARIAL COMPLIANCE REPORT UNDER REG. 24A OF SEBI (LODR), 2015
FOR FINANCIAL YEAR 2023-2024**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 8, 2019; please find enclosed the Annual Secretarial Compliance Report of the company for the financial year ended March 31, 2024 issued by Mr. Ronak D. Doshi, Practicing Company Secretary, for the financial year 2023-2024.

This is for your information and record.

On behalf of the Board,
FOR, POPULAR ESTATE MANAGEMENT LIMITED

VIKRAM CHHAGANLAL PATEL
DIRECTOR
DIN: 00166707



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF
POPULAR ESTATE MANAGEMENT LIMITED
(CIN: L65910GJ1994PLC023287)
FOR THE YEAR ENDED 31ST MARCH, 2024**

We, Ronak Doshi & Associates, Company Secretary in Practice have examined:

- All the documents and records made available to us and explanation provided by **POPULAR ESTATE MANAGEMENT LIMITED** ("the listed entity"),
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on 31st March, 2024 ("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, including:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; as amended from time to time
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable during the review period)**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; as amended from time to time
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable during the review period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable during the review period)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable 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 during the review period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Delisting of Equity Shares) (Amendment) Regulations, 2016; **(Not applicable during the review period)**

j) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009; **(Not applicable during the review period)**

k) Securities and Exchange Board of India (Depository Participant) Regulations, 2018; and circulars/ guidelines issued thereunder;

We hereby report that, during the review period the compliance status of the listed entity is appended below;

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	
2.	Adoption and timely updation of the Policies: All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/ guidelines issued by SEBI.	Yes	
3.	Maintenance and disclosures on Website: The Listed entity is maintaining a functional website. Timely dissemination of the documents/ information under a separate section on the website. Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website.	Yes	
4.	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	
5.	To examine details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	The entity has no subsidiary company.
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015	Yes	
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	



8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit committee	Yes	
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder	Yes	
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11.	Actions taken by SEBI or Stock Exchange(s), if any: No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	NA	No Actions have been taken against the listed entity/ its promoters/ directors either by SEBI or by Stock Exchanges.
12.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.	NA	There is No additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.

* Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

(a) The listed entity has **mostly** complied with the provisions of the above regulations and circulars/ guidelines issued thereunder, **except** in respect of matters as specified below:

Sr. No.	Compliance Requirements (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning, etc.	Details of violation	Fine Amount	Observations/ Remarks of Practicing Company Secretary	Management Response	Remarks
NOT APPLICABLE										



(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirements (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action Advisory/Clarification/ Fine/ Show Cause Notice/ Warning, etc.	Details of violation	Fine Amount	Observations/ Remarks of Practicing Company Secretary	Management Response	Remarks
NOT APPLICABLE										

PLACE: AHMEDABAD
DATE: 10/05/2024
UDIN: A023712F000348795

FOR, RONAK DOSHI & ASSOCIATES
PRACTICING COMPANY SECRETARY



Ronak D Doshi

RONAK D. DOSHI
PROPRIETOR
ACS NO.: 23712
C.P. NO.: 12725
PRC: 1698/2022