

May 27, 2024

BSE Limited

Department of Corporate Services 25th Floor P J Towers Dalal Street Mumbai – 400001 **National Stock Exchange of India Limited** 

Exchange Plaza Bandra Kurla Complex Bandra (East) Mumbai – 400051

Scrip Code: 532693/PUNJLLOYD

Symbol: PUNJLLOYD

Sub: <u>Annual Secretarial Compliance Report under Regulation 24A for the year ended</u>
March 31, 2024

Dear Sir/ Madam,

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and under Regulation 24A, please find enclosed the Annual Secretarial Compliance Report for the financial year ended March 31, 2024.

You are requested to please take the same on record.

Thanking You,

Yours faithfully, For **PUNJ LLOYD LIMITED** 

Dinesh Kumar Company Secretary

Encl.: As above.



## **DEEPAK DHIR & ASSOCIATES**

**Company Secretaries** 

Office No. 5-6, First Floor, WZ-98, Lamba Complex Jwala Heri Market, Paschim Vihar, New Delhi-110063 Mob.: +91-7503304860, Ph.: 011-45019978

E-mail: csdeepakdhir@gmail.com

Date: 21.05.2024

To,

Punj-Lloyd Limited (In Liquidation) 17-18, Nehru Place New Delhi-110019

Dear Sir(s),

### Sub: Annual Secretarial Compliance Report for the financial year 2023-24

We have been engaged by **Punj-Lloyd Limited** vide CIN: L74899DL1988PLC033314 having its registered office at '17-18 Nehru Place, New Delhi-110019' (herein after referred to as "the Company") to issue the Annual Secretarial Compliance Report in terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with Securities and Exchange Board of India Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated 11th July, 2023.

It is the responsibility of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable Securities and Exchange Board of India Regulations and Circulars / Guidelines issued thereunder from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable Securities and Exchange Board of India Regulations and Circulars / Guidelines issued thereunder from time to time and issue a report thereon.

Our audit was conducted in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Annual Secretarial Compliance Report is enclosed.

Thanking you

For DEEPAK DHIR & ASSOCIATES

**COMPANY SECRETARIES** 

Deepak Kumar Dhir F.C.S. 11633, C.P. 17296

Peer Review No. 1918/2022

UDIN: F011633F000408777

Encl: as above

# **DEEPAK DHIR & ASSOCIATES**

**Company Secretaries** 

Office No. 5-6, First Floor, WZ-98, Lamba Complex Jwala Heri Market, Paschim Vihar, New Delhi-110063 Mob.: +91-7503304860, Ph.: 011-45019978

E-mail: csdeepakdhir@gmail.com

# Secretarial Compliance Report of Punj-Lloyd Limited (CIN: L74899DL1988PLC033314) for the year ended March 31, 2024

We, M/s Deepak Dhir & Associates, have examined:

- (a) all the documents and records made available to us and explanation provided by **Punj-Lloyd 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 March 31, 2024 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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; (As amended up to date)
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;(Not Applicable during this financial year 2023-24)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (Not Applicable during this financial year 2023-24)
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable during this financial year 2023-24)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not Applicable during this financial year 2023-24)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable during this financial year 2023-24)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not Applicable during this financial year 2023-24)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) (other regulations as applicable)

and circulars/ guidelines issued thereunder;



We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observation s /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), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	The Company is under CIRP since March 8, 2019 and under Liquidation as a going concern since May 27, 2022.
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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes	The Company is under CIRP since March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and the Board of the Company is suspended due to CIRP proceedings ongoing in the Company.
3.	Maintenance and disclosures on Website:  The Listed entity is maintaining a functional website  Timely dissemination of the documents/ information under aseparate 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 Yes No	The Company is under CIRP since March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and the Board of the Company is suspended due to CIRP proceedings ongoing in the Company.
4.	Disqualification of Director:  None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	The Company is under CIRP since March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and the Board of the Company is suspended due to CIRP proceedings ongoing in the Company.



5.	Details related to Subsidiaries of listed entities have been examined w.r.t.:	No material subsidiary exists as on date.	March 8, 2019 and
	<ul><li>(a) Identification of material subsidiary companies</li><li>(b) Disclosure requirement of material as well as other subsidiaries</li></ul>		under Liquidation as a going concern since May 27, 2022 and the Financial from Quarter ended March 31, 2019 to quarter ended March 31, 2024 are under compilation and due to non-availability of the Financial Results, the Company is unable to determine the Material Subsidiary.
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/during the financial year as prescribed in SEBI Regulations.	NA	The Company is under CIRP since March 8, 2019. All the independent Directors of the Company resigned on 08.03.2019 and the Company is under Liquidation as a going concern since May 27, 2022 and the Board of the Company is suspended due to CIRP proceedings ongoing in the Company.
8.	Related Party Transactions:  (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or  (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.		No RPT during the period under review.



9.	Disclosure of events or information:		-
	The listed entity has provided all the required disclosure(s) under Regulation 30 along with 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 action(s) has been 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 except as provided under separate paragraph herein (**).	Yes	NSE had issued Show cause notice for Delisting of Equity Shares of the Company. The Company replied to NSE vide its letter dated May 18, 2023 for not taking any action for Delisting of Equity Shares of the Company since the company is under Corporate Insolvency Resolution Process since March 8, 2019 and under Liquidation as a going concern w.e.f. May 27, 2022.
12.	Additional Non-compliances, if any:  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	-

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18" October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	Compliances with the following conditions	while appointing/re-appointing	g an auditor



	<ul> <li>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</li> <li>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</li> <li>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</li> </ul>	NA NA	No appointment/reappointment had been made for Statutory Auditors because Annual General Meeting since 2019 not held yet due to the ongoing process of compilation of Financial Results of the Company from 31.03 2019 till date since the Company is under CIRP since March 08, 2019 and under Liquidation as a going concern since 27.05.2022.
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2.	Other conditions relating to resignation of statutory aud	litor	1
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:  a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.  b. In case the auditor proposes to resign, all	NA	The Company is under CIRP since March 08, 2019 and under Liquidation as a going concern since 27.05.2022 and the Financial Results from Financial Year 2019 onward till March 31, 2024 are under Compilation by the Liquidator, the Statutory Auditors has not been able the issue the Report.
	concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.  c. The Audit Committee / Board of Directors,	NA	

as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.  ii. Disclaimer in case of non-receipt of information:  The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listedentity/ its material subsidiary has not provided information as required by the auditor.	NA	The Company is under CIRP since March 08, 2019 and under Liquidation as a going concern since 27.05.2022 and the Financial Results from Financial Year 2019 onward till March 31, 2024 are under Compilation by the Liquidator, the Statutory Auditors has not been able the issue the Report.
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Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	NA	_

(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)	Regu- lation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount (In Indian Rupees )	Observations/ Remarks of the Practicing Company Secretary	Man- age- ment Re- sponse	Re- mark s
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1.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requireme nts) Regulation s, 2015	17,18,1 9,20 & 21	Non compliance.	NSE	Email sent by NSE	Clarification sought by Stock Exchnage vide email dated April 03, 2023 for non compliance with the provision s of regulation 17,18,19,2 0 & 21 of SEBI (LODR) Reguations , 2015	NIL	8, 2019 and under Liquidation as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LODR) Regulations 2015, the provisions of regulation 17,18,19,20 & 21 are not applicable presently in the Company.	Is under CIRP from March 8, 2019 and under Liquidatio n as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LOD R) Regulatio ns 2015, the provisions of regulation	
2.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation s, 2015	27	Non Compliance	NSE	Email sent by NSE	Clarification sought by stock exchange with reference to email dated April 24, 2023 for non filing of complete information in the corporate governance report for the quarter ended 31st March, 2023	Nil	The Company is under CIRP from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LODR) Regulations 2015, the provisions of regulation 17,18,19,20 & 21 are not applicable presently in the Company.	The Company is under CIRP from March 8, 2019 and under Liquidatio n as a going concem since May 27, 2022 and as per regulation 15 2(A) of SEBI(LOD R) Regulatio ns 2015, the provisions of regulation	



3.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requireme nts) Regulation s, 2015	27	NSF	Clarification sought by stock exchange with vide email dated May 22, 2023 for no filing of complete information in the corporate governance report prior to the quarter ended 31st March, 2023	Nil	Company is under CIRP from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LODR) Regulations 2015, the provisions of regulation 17,18,19,20 & 21 are not applicable presently in the Company.	is under CIRP from March 8, 2019 and under Liquidatio n as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LOD R) Regulatio ns 2015, the provisions of regulation	
4.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requireme nts) Regulation s, 2015	33	11	Clarification sought by stock exchange vide email dated June 06, 2023 with reference to non filing of financial results for the period ended 31.03.2023	Nil	Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and due to	The Company is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidatio n as a going concern since May 27, 2022 and due to various unavoidab le reasons there is a delay in compilatio n of Audited / Unaudited Financial results of the Company	

5.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requireme nts) Regulation s, 2015	33		BSE	The Stock Exchange vide email dated July 11, 2023 sought clarification for Non disclosure of reason for delay in submission of financial results for Quarter ended December 2022	Nil	various unavoidable reasons there is a delay in compilation of Audited / Unaudited Financial results of the Company since Financial year ended 31.03.2019.	is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidatio n as a going concern since May 27, 2022 and due to various unavoidab le reasons there is a delay in compilatio n of Audited / Unaudited / Unaudited Financial results of the Company	
6.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation s, 2015	27	Deeps to the state of the state	NSE 17796 * \$	Clarification sought by stock exchange vide email dated August 03, 2023 sought clarification for no filing of complete information in the corporate governance report prior to the quarter ended 30th June, 2023		Company is under CIRP from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI (LODR) Regulations 2015, the provisions of regulation 17,18,19,20 & 21 are not applicable presently in the Company.	is under CIRP from March 8, 2019 and under Liquidatio n as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LOD R) Regulatio ns 2015, the provisions of regulation	

7.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation s, 2015	27	BSE	Clarification sought by stock exchange vide Email dated September 09, 2023 for discrepanc y in corporate governance report .	TNII	regulation 15 2(A) of SEBI(LODR) Regulations 2015, the provisions of regulation 17,18,19,20 & 21 are not applicable presently in the Company.	is under CIRP from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LOD R) Regulation so 2015, the provisions of regulation regulation	
8.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requireme nts) Regulation s, 2015	27	NSE	Clarification sought by stock exchange with reference to Email dated October 18, 2023 for Discrepanc y in corporate governance report .	Nil	The Company is under CIRP from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LODR) Regulations 2015, the provisions of regulation 17,18,19,20 & 21 are not applicable presently in the Company.	The Company is under CIRP from March 8, 2019 and under Liquidatio n as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LOD R) Regulatio ns 2015, the provisions of regulation	



9.	The Companies Act, 2013	96		BSE	Not Holding Annual General Meeting for the Financial Year ended on 31.03.2023	NIL	concern since May 27, 2022 and the Company has filed an application with the ROC for seeking extension in time of three months for holding the AGM 2023 and the ROC has granted approval for the same.	is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and the Company has filed an application with the ROC for seeking extension in time of three months for holding the AGM 2023 and the ROC has granted approval for the	
10.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation s, 2015	27	Ornir & Company Sec	BSE	Query from Exchange in relation to Periodic/ev ent based submission /Non submission by the Company with respect to email dated January 23, 2024 for discrepanc y in Corporate Governance e Report for the Quarter ended December 2023.	NIL	The . Company is under CIRP from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LODR) Regulations 2015, the provisions of regulation 17,18,19,20 & 21 are not applicable presently in the	is under CIRP from March 8, 2019 and under Liquidatio n as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LOD R) Regulatio ns 2015, the provisions of regulation	

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requireme nts) Regulation s, 2015	27	BSE	Query from Exchange in relation to Periodic/ev ent based submission /Non submission by the Company with respect to email dated January 27, 2024 for discrepancy in Corporate Governance Report for the Quarter ended December 2023.	Nil	Company is cunder Corporate Insolvency Resolution Process from March 8, 2019 and Mi under Liquidation as a going concern since May 27, and The Company has suitably replied to the Exchange	under orporate solvency esolution cocess or
The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation s, 2015	27	NSE	Query from Exchange in relation to Periodic/ev ent based submission /Non submission by the Company with respect to email dated February 01, 2024 for discrepanc y in Corporate Governanc e Report for the Quarter ended December 2023.		Liquidation as a going concern since May 27, 2022 and as per regulation 15 2(A) of SEBI(LODR regulations 2015, the provisions of 17,18,19,20 as 21 are not of applicable respensently in 17, the Company.	rmpany under RP from arch 8, 19 and der quidatio as a ining neem ce May 2022 d as per gulation 2(A) of BI(LOD gulatio 2015, e poissions gulation 18,19,2 21 are



The Securities and Exchange Board of India (Listing Obligations and Disclosure Requireme nts) Regulation s, 2015	BSE	Query from Exchange vide email dated February 16, 2024 for non submission of Financial results for the Quarter ended December 31, 2023	The Company is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, 2022. The Submitted a suitable reply to the Submission of Financial results for the Quarter ended December 31, 2023
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guide- lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount (in Indian Rupees )	Observations/ Remarks of the Practicing Company Secretary	Man- age- ment Re- sponse	Re- mark s
	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation s, 2015	ŧ	Since the Company is under CIRP since March 08, 2019 and under Liquidation as a going concern since 27.05.2022. The Financial Results from F.Y. 2018-19 till date are under compilation.		Fine Fine	BSE email dated June 29, 2022 for imposing penalty for not filing of Financial Results for quarter ended March 31, 2022 in terms of Listing Regulation 33 of SEBI (LODR), 2015		Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, 2022, the Financial results from F.Y. 2018- 19 till date are under compilation and will be submitted with the Stock Exchanges and the Company has submitted equest with Stock Exchanges in alisations and the Company has submitted equest with Stock Exchanges ior waiver of sines.	is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation n as a going concern since May 27, 2022, the Financial results from F.Y. 2018-19 till date are under compilation n and will be submitted with the Stock Exchange s after finalisation s and the Company has	

2.	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	33	Since the Company is under CIRP since March 08, 2019 and under Liquidation as a going concern since 27.05.2022. The Financial Results from F.Y. 2018-19 till date are under compilation		Fine	BSE email dated September 14, 2022 for imposing penalty for not filing of Financial Results for quarter ended June 30, 2022 in terms of Listing Regulation 33 of SEBI (LODR), 2015		19 till date are under compilation and will be submitted with the Stock Exchanges after finalisations and the Company has submitted request with Stock Exchanges for waiver of fines.	is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, 2022, the Financial results from F.Y. 2018-19 till date are under compilation and will be submitted with the Stock Exchange s after finalisations s and the Company has		
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#### Note:

The Hon'ble National Company Law Tribunal, Principal Bench, New Delhi (NCLT) vide an order dated 27.05.2022 under section 33(1) of the Insolvency and Bankruptcy Code, 2016 R/W Rule 11 of NCLT Rules, 2016, ordered Liquidation of the Corporate Debtor, namely M/s Punj Lloyd 'as a going concern', with further directions. In terms of the above said order Mr. Ashwini Mehra, Resolution Professional of the Company has been appointed as the Liquidator of the Company.

\* Further, in terms of Regulation 15(2A) of SEBI (LODR) Regulations, 2015, the provisions specified in regulation 17, 18, 19, 20 and 21 are not applicable during the CIRP period.

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\*\* letters/emails received from the Stock Exchange(s) for non- Submission of Corporate Governance Report under Regulation 27(2) and Financial Results under Regulation 33 of SEBI (LODR) Regulations, 2015 the Company has suitably explained the causes of not complying with the provisions of Corporate Governance Report, delay in publishing Financial Results and requested the Stock Exchange(s) to waive the penalty imposed upon the Company in terms of SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 (Erstwhile SEBI Cir No. SEBI/HO/CFD/CMD/CIR/P/2018/77 dated May 3, 2018).

For Deepak Dhir & Associates
Company Secretaries

Deepak Kumar Dhir

CP No. 17296 Peer Review No. 1918/2022

Date: 21.05.2024 Place: New Delhi

UDIN: F011633F000408777