



Sunstar Realty Development Limited

CIN: L70102MH2008PLC184142

Date: 30/06/2021

To
BSE Limited
Phirozee Jeejeeboy Towers,
Dalal Street Fort Mumbai-400001

Subject: Annual Secretarial Compliance Report for the year ended March 31, 2021

BSE Code: 535141

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019; please find enclosed herewith Annual Secretarial Compliance Report for the year ended March 31, 2021 issued by Kavita Raju Joshi, Practicing Company Secretary.

We request you to take the same on record and disseminate the same for information to the members.

Yours Faithfully

For Sunstar Realty Development Limited

Sunil Bhandari
Director
DIN: 03120545



PCS Kavita Raju Joshi

Company Secretary

FCS, MCOM

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Secretarial Compliance Report of M/s Sunstar Realty Development Limited for the year ended March 31, 2021.

I, Kavita Raju Joshi have examined:

- a. All the documents and reports made available to us and explanation provided by M/s Sunstar Realty Development Limited CIN: L70102MH2008PLC184142 ("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, 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, includes:-

- a. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 and Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- 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;


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Practising Company Secretary
FCS No. 9074, C.P. No. 8893

- i. Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- j. Any other regulations, circular etc issued by SEBI applicable to the Company.

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:

Sl. No.	Compliance Requirement (Regulations/ Guidelines specific clause)	Requirement Circulars/ including	Deviations	Observations/Remarks of the Practising Company Secretary
1.				

Note: The trading in Equity Shares of the Company is suspended due to penal reasons by BSE vide its Notice dated 18/03/2019; Notice No. 20190318-41 with effect from 09/04/2019. Further as reported by the management, the Company is in process of revoking the suspension.

Also, the Company has not yet paid Annual Listing fees for the Financial Year 2020-21.

The Whole Time Secretary of the Company has resigned from the Company with effect from May 07, 2021.

- b. The Listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my examination of those records.
- c. The following are the details of actions taken against the listed entity/ 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:

Sl. No.	Action taken by	Details of Violation	Details of action taken E. g. fines, warning letter, debarment, etc	Observations/ remarks of the Practising Company Secretary on the action taken by the Listed entity


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d. There were no observations made in the Secretarial Compliance Report of the previous year.

Note: Due to the outbreak of COVID-19 pandemic and the current lockdown, physical examination of documents under the SEBI Act and Regulations is not possible; we have therefore relied upon the documents provided by the Company in electronic mode for Audit purpose.


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Practising Company Secretary
FCS No. 9074, C.P. No. 8893

Kavita Raju Joshi
Membership No: 9074
COP No: 8893

Place: Mumbai
Date: 30.06.2021
UDIN: F009074C000552067