



NARENDRA PROPERTIES LTD.

Regd. Off. : Makanji House, 2nd Floor, # 49 (Old 25) Barnaby Road, Kilpauk, Chennai - 600 010.

CIN: L70101TN1995PLC031532

Dated: December 12, 2023

To,

THE BSE LIMITED
PHIROZE JEEJEEBHOY TOWERS
26TH FLOOR, DALAL STREET
MUMBAI - 400001

Kind Attn: Ms Reena Raphel, Associate Manager, Listing Compliance; Ms Bijal Shettigar / Mr. Rohan Kallan, Assistant Manager-Listing Compliance

Dear Sir / Madam,

Sub: Fines as per SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance).

We are in receipt of your Email dated 07.12.2023 regarding Reminder for freezing of promoters' demat account (SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance).

In order to avoid the stated action, we have remitted the levied fine as per details furnished below vide NEFT ref. N342232776045532 (copy of remittance ack. attached for your ready reference):

Fee	:	4,000
IGST @18%	:	720
Payable	:	4,720
Less : TDS @ 10% on Rs. 4,000/-	:	400
Paid on 08/12/2023	:	4,320

We wish to bring to your kind attention that we have made a representation vide our email dated 24.11.2023 substantiating that we are not in Non-compliance with the requirements of the relevant SEBI (LODR) Regulations, 2015, requirement on the issue pointed out by you, as could be observed from the explanations furnished in the said letter attached and sent vide the email dated 24.11.2023. We are attaching herewith the said letter dated 24.11.2023 for your ready reference. We wish to inform you the Exchange has still not considered our representation. We once again humbly request you to kindly consider our representation for waiver / withdrawal of the fine levied since, as stated by our detailed explanation, we are not in violation of the Regulation 20(2)(2A) and hence the fine levied by you is onerous and cripplingly punitive.

 *Chirag* *M. Kallan*

Tel : +91 - 44 - 2644 6600 / 2647 6600 / 4269 6600 / 4958 6600

E-mail : info@narendraproperties.com Website : www.narendraproperties.com



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Upon receipt of your email dated 07.12.2023, we have proceeded and paid the fine levied as per details furnished above in order to avoid further punitive action by the Exchange like freezing of promoters' shareholding, etc. However, we once again request you to kindly consider our representation and waive the fine.

Further, we observe from your email dated 07.12.2023 that as per the Policy for exemption of fines detailing the reasons for waiver / reduction of fines levied as per the provisions of SEBI SOP circular as disseminated on the Exchange website. An application for waiver of fines submitted by the company if any, will be considered **only after the applicant company has first complied with the compliances for which it is seeking full / partial waiver of fines**, as required under the Listing Regulation. Now that we have remitted the fine in compliance with your directive, we request you to kindly consider waiver on the grounds as represented in our letter dated 24.11.2023.

We request you to kindly do the needful and acknowledge the receipt of this letter.

This letter is filed for your consideration through the portal www.listing.bseindia.com and also by email to bse.soplodr@bseindia.com; bijal.shettigar@bseindia.com and Rohan.Kallan@bseindia.com.

Thanking you,

Yours faithfully,

For NARENDRA PROPERTIES LIMITED

CHIRAG N MAHER
MANAGING DIRECTOR
DIN: 00078373



Encl:

- 1.Fees remittance acknowledgement dated 8.12.2023
- 2.Our letter dated 24.11.2023 requesting for withdrawal / waiver of fine levied, furnishing detailed explanation for granting waiver.

Third Party Funds Transfer

 Print This Page

Congratulations, your RTGS/NEFT transaction is completed successfully!

You've won yourself a **Special Offer**.

Avail now

*T&C apply



To Other Bank (NEFT)

STEP 1 ENTER DETAILS	STEP 2 CONFIRM TRANSACTION	STEP 3 ACKNOWLEDGEMENT
Reference Number	N342232776045532	
From Account	50200008770622	
Beneficiary Name	BSE LTD	
Beneficiary IFSC Code	ICIC0000104	
Beneficiary Account Number / Credit Card Number	BSER07874	
Bank Name	ICICI BANK LIMITED	
Transfer Amount	4,320.00	
Transfer Description	SOPREVIEWSEP23Q	
Make Another Transfer		

Note:

- The actual time taken to credit the account depends on the time taken by the Payee's Bank to process the payment.
- The money will reach the Payee's bank within the time stipulated by the Reserve Bank of India.
- HDFC Bank is not responsible for any charges / commission of any kind levied/charged by the Beneficiary Bank.
- For details on safe NetBanking practices please [click here](#)



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ANNEXURE I

To,
Listing Compliance,
BSE Limited,
Ground Floor,
P.J. Towers, Fort,
Mumbai-400 001

Subject : Details of Payment of fines for Non-Compliance with Regulations of SEBI (LODR) Regulations, 2015

Remittance details:

Scrip Code	Regulation & Quarter	Amount paid	TDS deducted, if any	Net Amount paid	GST No. (Mandatory to upload on BSE Listing Centre) (*)
531416	Regulation 20(2)/(2A) for the quarter ended September 2023	Rs. 4,320/-	Rs. 400/-	Rs. 4,720/-	33AAACN6162H1ZN

**(In case GSTin No of company is not uploaded on the Listing Centre or Declaration for Unregistered Dealer is not received by us, company can not claim any GST input credit for the invoices raised by us.)*

Remitted by:

Cheque/DD No.	Date	UTR No. for RTGS /NEFT
NA	08/12/2023	N342232776045532

Thanking you,

Yours faithfully,

For NARENDRA PROPERTIES LTD.

Chirag M. Mahur
Managing Director

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Regd. Off. : Makanji House, 2nd Floor, # 49 (Old 25) Barnaby Road, Kilpauk, Chennai - 600 010.

CIN: L70101TN1995PLC031532

Dated: November 24, 2023

To,

THE BSE LIMITED
PHIROZE JEEJEEBHOY TOWERS
26TH FLOOR, DALAL STREET
MUMBAI - 400001

Kind Attn: Ms Sonali Kurhade, Associate Manager, Listing Compliance

Dear Sir / Madam,

Sub: Fines as per SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance).

We are in receipt of your email dated 21.11.2023 drawing our attention to the following Non-compliance / Late Compliance:

Regulation 20(2)/(2A)

Non-compliance with the constitution of stakeholder relationship committee

We wish to inform you that we are not in Non-compliance with the requirements of the relevant SEBI (LODR) Regulations, 2015, requirement on the issue pointed out by you, as could be observed from the explanations furnished below:

1. Mr Narendra C Maher, Director, who was also a member of the Stakeholder Relationship Committee, has vacated office as a Director at the AGM held on 28.09.2023. Upon his vacation as a Director, he ceased to be a member of Stakeholder Relationship Committee (SRC) w.e.f. 28.09.2023.

2. As per Regulation 17(1E) of SEBI(LODR) Regulations, the Company had time until 28.12.2023 to appoint another Director in the place of Mr Narendra C Maher who has vacated office as a Director and a Member of SRC at the AGM held on 28.09.2023.

3. The Board of Directors have appointed an Independent Director Mr Arvind Kumar Ayush Jain as a Member of the SRC at its meeting held on 10.11.2023. It may kindly be noted that there was no intervening Board Meeting or SRC meeting between 28.09.2023 and 10.11.2023 since there was no valid agenda requiring the approval of the Board or the SRC during this period. Besides, the matters relating to Stakeholder Relationship have been effectively upheld and attended by the KMPs of the Company and there were no occasions where the SRC has to meet on deciding on any matters of Stakeholder Relationship during the referred period. Hence, keeping in view the time limit available to the Company as per Regulation 17(1E) of SEBI(LODR) Regulations, 2015, neither the provisions of SEBI (LODR) 2015, nor its spirit has been violated by the Company during the subject period of 28.09.2023 to 10.11.2023, as such no penal action under SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023, may be required.



Chirag Maher

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4.The Company, even though it is listed on the main board of the Exchange, is a small company as per the definitions of Companies Act, 2013, and as per its Audited Balance sheet as on 31.3.2023, its Paid Up Capital is Rs.7.16 crores, Net-worth of 35.86 crores and Total Revenue of Rs.7.76 crores, entitling for exemption or leniency in exemption from applicability of the specified Regulations of SEBI (LODR) Regulations, 2015.

5. We wish to further bring to your kind attention that the Company has been guided by the above mentioned interpretation of the Regulations and have acted accordingly, and without any malafide intentions.

We wish to further inform you that the stand taken for invoking penal provisions under the referred SEBI Regulations and Circular is onerous and crippling punitive to the understanding and interpretation of the subject regulations by the Company especially so when the Company has diligently ensured compliance on all aspects of the Regulations as per the explanation submitted above and when there are no events adversely affecting stakeholder interest.

We request you to kindly consider withdrawing the penal action initiated as per your above referred email and not to levy the penalty as proposed.

This disclosure is filed through the portal www.listing.bseindia.com and also by email to bse.soplodr@bseindia.com.

We request you to kindly take on record the above and acknowledge the receipt of this letter.

Thanking you,

Yours faithfully,

For NARENDRA PROPERTIES LIMITED


CHIRAG N MAHER
MANAGING DIRECTOR
DIN: 00078373

