

## Brigade Enterprises Limited

Corporate Identity Number (CIN) : L85110KA1995PLC019126  
Registered Office : 29th & 30th Floor, World Trade Center  
Brigade Gateway Campus, 26/1, Dr. Rajkumar Road  
Malleswaram - Rajajinagar, Bengaluru - 560 055, India  
T : +91 80 4137 9200  
E : enquiry@brigadegroup.com W : www.brigadegroup.com



Ref: BEL/NSEBSEASCR/13052022

13<sup>th</sup> May, 2022

Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza,  
Bandra Kurla Complex,  
Bandra (East),  
Mumbai - 400 051

Department of Corporate Services - Listing  
BSE Limited  
P. J. Towers  
Dalal Street,  
Mumbai - 400 001

Re.: Scrip Symbol: BRIGADE/Scrip Code: 532929

Dear Sir,

**Sub.: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2022:**

We are enclosing herewith the Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2022 issued by Ms. Aarthi G. Krishna, Practicing Company Secretary (FCS No. 5706). This is pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February 2019.

This is also hosted on the Company's website at [www.brigadegroup.com](http://www.brigadegroup.com)

Kindly take the same on your records.

Thanking you,  
Yours faithfully,

For **Brigade Enterprises Limited**

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PALANIMUTHU PALANIMUTHU  
U Date: 2022.05.13  
18:42:26 +05'30'

**P. Om Prakash**  
**Company Secretary & Compliance Officer**

Encl.: a/a



Brigade is recognised as being among  
the best work places in the Real Estate Industry.



**Secretarial Compliance Report of Brigade Enterprises Limited  
for the year ended 31<sup>st</sup> March, 2022<sup>1</sup>**

I, **Aarthi Gopala Krishna** have examined:

- a) all the documents and records made available to us and explanation provided by **Brigade Enterprises Limited** ("the listed entity"),
- b) the filings/submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) other document/filing, as may be relevant, which has been relied upon to make certification, for the Year ended 31<sup>st</sup> March, 2022 ("Review Period") in respect of compliance with 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 Contract (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;
- b) 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 (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- e) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; 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, **except** in respect of matters specified below:-

**K RAJSHEKAR**  
**AARTHI G KRISHNA**  
**COMPANY SECRETARIES**

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1	Code of Conduct formulated under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	Contra Trade carried out	Designated person has executed contra trade and the same has been reported to the Stock Exchanges

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

Sr. No.	Action taken by	Details of violations	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/Remarks of the Practicing Company Secretary, if any.
NIL				

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for all the year ended... <i>(The years are to be mentioned)</i>	Action taken by the listed entity, if any	Comments of Practicing Company Secretary on actions taken by the listed entity
Not applicable				

- e) There was no instance for the listed entity to comply with the Pars 6(A) and 6(B) of SEBI Circular CIR/CFD/CMD1/ 114/2019 dated October 18, 2019.

Place: Bengaluru  
 Date: 12<sup>th</sup> May, 2022  
 UDIN: F005706D000302761

Signature : AARTHI GOPALA  
 : KRISHNA  
 Name of PCS : Aarthi Gopalakrishna  
 FCS No. : 5706  
 C P No. : 5645

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 GOPALA KRISHNA  
 Date: 2022.05.12 13:49:01 +05'30'

<sup>i</sup> To be read with the Annexure

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ANNEXURE

Our report of even date is to be read along with this letter.

We have been engaged by Brigade Enterprises Limited (hereinafter referred to as 'the Company') whose Equity Shares are listed on National Stock Exchange of India Limited and BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under 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 SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

**Place: Bengaluru**  
**Date: 12<sup>th</sup> May, 2022**

**Signature** : AARTHI GOPALA  
**Name of PCS** : KRISHNA  
**FCS No.** : Aarthi Gopala Krishna  
: 5706

Digitally signed by AARTHI  
GOPALA KRISHNA  
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