



May 28, 2025

**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: Annual Secretarial Compliance Report under Regulation 24A for the year ended March 31, 2025

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, 2025.

You are requested to please take the same on record.

Thanking You,

Yours faithfully

For PUNJ LLOYD LIMITED (In Liquidation)

Adhish Swaroop
Adhish Swaroop
Company Secretary

Digitally signed by Adhish Swaroop
DN: cn=P, o=Personal, title=9641,
pseudonym=30745f5077442bba2640166
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2.5.4.03=3b27f15bfb14b45c3ee4e82479
e388dfbbbad9e15511a18cd35ee0fe8a694
94, postalCode=110084, st=Delhi,
serialNumber=c955ae5d13204dfbab8c0
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46d40154, cn=Adhish Swaroop
Date: 2025.05.28 15:55:04 +05'30'



Date: 26.05.2025

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 2024-25

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: F011633G000440952

Encl: as above



Secretarial Compliance Report of Punj-Lloyd Limited (CIN: L74899DL1988PLC033314) for the year ended March 31, 2025

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

- all the documents and records made available to us and explanation provided by **Punj-Lloyd 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 Report.

For the financial year ended March 31, 2025 ("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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; **(As amended up to date)**
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable during this financial year 2024-25)**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not Applicable during this financial year 2024-25)**
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable during this financial year 2024-25)**
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable during this financial year 2024-25)**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable during this financial year 2024-25)**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and

any other regulations, circulars/ guidelines issued thereunder as applicable.



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)	Observations /Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).</p>	Yes	The Company is under CIRP since March 8, 2019 and under Liquidation as a going concern since May 27, 2022.
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> ● 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 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.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> ● 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 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.	<p>Disqualification of Director:</p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	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.	<p>Details related to subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>	No material subsidiary exists as on date.	The Company is under CIRP since March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and the Financial from Quarter ended March 31, 2019 to quarter ended March 31, 2025 are under compilation and due to non-availability of the Financial Results, the Company is unable to determine the Material Subsidiary.
6.	<p>Preservation of Documents:</p> <p>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.</p>	Yes	--
7.	<p>Performance Evaluation:</p> <p>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.</p>	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.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of audit committee for all related party transactions; or</p> <p>(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.</p>	NA NA	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 (**).	NA	--
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	Yes	The Statutory Auditors, BGJC & Associates LLP, have tendered their resignation dated November 28, 2024, from the listed entity and the necessary intimation have been sent to the Stock Exchange and RoC.
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	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)	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	Management Response	Remarks
1.	The Insolvency Bankruptcy Board of India	IBBI	Observation made by the Exchange	NSE	Email sent by NSE	Clarification sought by Stock Exchange vide email dated 15th June 2024 to update the status of the Company	Nil	Suitable reply filed by the Company vide letter dated June 18, 2024, stating that the Company has been under CIRP since March 8, 2019, and under liquidation as a going concern since May 27, 2022, with the Liquidator conducting e-auctions and making necessary disclosures to the Stock Exchanges.	The Company has been under CIRP since March 8, 2019, and under liquidation as a going concern since May 27, 2022; further developments are in process, with updates duly disclosed, and the Liquidator is proceeding with asset sales in accordance with IBC regulations.	
2.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	31A(6)	Observation made by the Exchange	NSE	Email sent by NSE	Clarification sought by the Stock Exchange vide email dated July 23, 2024, regarding the exclusion of Mr. Uday Punj from the promoter group despite the transmission of shares from Late	Nil	Reply filed by the listed entity vide email dated 24th July 2024 stating shares were held by Mr. Uday Punj as nominee and later transmitted to Pt. Kanhaya Lal Dayawanti Punj Foundation, shown as	The Company stating that shares were temporarily held by Mr. Uday Punj as nominee and subsequently transmitted to Pt. Kanhaya Lal Dayawanti	



						Mr. Satya Narain Prakash Punj, in terms of Regulation 31A(6) of SEBI (LODR) Regulations, 2015.		Promoter Group.	Punj Foundation as per the Will, which is disclosed as part of the Promoter Group.	
3.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	34	Non compliance	NSE	Email sent by NSE	Clarification sought by stock exchange vide email dated 01st October 2024 for non-submission of Annual Report of the financial year 2023-24.	Nil	Reply filed vide letter dated October 3, 2024, stating ROC approval obtained for AGM extension till December 31, 2024, as the Company is under liquidation as a going concern.	The Company is under liquidation as a going concern and AGM extension till December 31, 2024, has been approved by ROC.	
4.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17, 18, 19, 20 & 21	Non compliance	BSE	Email sent by BSE	Clarification sought by stock exchange vide email dated 21st February 2025 for discrepancies in Corporate Governance Report for the Quarter ended December 31, 2024	Nil	The Company informed BSE that 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 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.	



5.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17, 18, 19, 20 & 21	Non compliance	BSE	Email sent by BSE	Clarification sought by stock exchange vide email dated 09th August 2024 for discrepancies in Corporate Governance Report for the Quarter ended June 30, 2024	Nil	The Company informed BSE that 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 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.
6.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17, 18, 19, 20 & 21	Non compliance	BSE	Email sent by BSE	Clarification sought by stock exchange vide email dated 23rd October 2024 for discrepancies in Corporate Governance Report for the Quarter ended September 30, 2024	Nil	The Company informed BSE that 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 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.



7.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17, 18, 19, 20 & 21	Non compliance	NSE	Email sent by NSE	Clarification sought by stock exchange vide email dated 18th April 2024 for discrepancies in Corporate Governance Report for the Quarter ended March 31, 2024	Nil	The Company informed NSE that 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 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.
8.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17, 18, 19, 20 & 21	Non compliance	NSE	Email sent by NSE	Clarification sought by stock exchange vide email dated 07th August 2024 for discrepancies in Corporate Governance Report for the Quarter ended June 30, 2024	Nil	The Company informed NSE that 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 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.



9.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17, 18, 19, 20 & 21	Non compliance	NSE	Email sent by NSE	Clarification sought by stock exchange vide email dated 14th October 2024 for discrepancies in Corporate Governance Report for the Quarter ended September 30, 2024	Nil	The Company informed NSE that 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 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.
10.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17, 18, 19, 20 & 21	Non compliance	NSE	Email sent by NSE	Clarification sought by stock exchange vide email dated 21st February 2025 for discrepancies in Corporate Governance Report for the Quarter ended December 31, 2024	Nil	The Company informed NSE that 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 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.



11.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	31(b)	Observation made by the Exchange	NSE	Email sent by NSE	Clarification sought by the stock exchange vide email dated 30th August 2024 on the increase of 250 physical shares in the shareholding pattern for June 30, 2024, as compared to March 31, 2024.	Nil	Reply filed by the listed entity stating the increase of 250 physical shares in the June 30, 2024 shareholding pattern is due to rematerialisation, as confirmed by the RTA, Kfin Technologies Ltd.	The Company stating that the increase of 250 physical shares as on June 30, 2024, is due to rematerialisation, as confirmed by the RTA, KFin Technologies Ltd.
12.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	31(b)	Observation made by the Exchange	NSE	Email sent by NSE	Clarification sought by the stock exchange vide email dated 23rd May 2024 on the increase of 255 physical shares in the shareholding pattern for March 31, 2024, as compared to December 31, 2023.	Nil	Reply filed by the listed entity stating the increase of 255 physical shares in the March 31, 2024 shareholding pattern is due to rematerialisation, as confirmed by the RTA, Kfin Technologies Ltd.	The Company stating that the increase of 255 physical shares as on March 31, 2024, is due to rematerialisation, as confirmed by the RTA, KFin Technologies Ltd.
13.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	31(b)	Observation made by the Exchange	NSE	Email sent by NSE	Clarification sought by the Stock Exchange vide email dated July 5, 2024, regarding the quarterly submission of the Shareholding Pattern for March 31, 2021.	Nil	Reply filed by the listed entity stating that 20,814,229 equity shares held by Late Mr. Satya Narain Prakash Punj were transmitted to Mr. Uday Punj as per his will, hence NIL shareholding was shown for the deceased promoter as on March	The Company stating that 20,814,229 equity shares held by Late Mr. Satya Narain Prakash Punj were transmitted to Mr. Uday Punj as per his will, hence NIL shareholding was shown for the deceased



								31, 2021.	promoter as on March 31, 2021.	
14.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	31(b)	Observation made by the Exchange	NSE	Email sent by NSE	Clarification sought by the Stock Exchange vide email dated July 29, 2024, regarding the submission of Shareholding Pattern for the quarter ended March 31, 2021 to June 30, 2024.	Nil	Reply filed by the listed entity stating that shares were temporarily transmitted to nominee Mr. Uday Punj as per procedure and subsequently transferred to Pt. Kanhaya Lal Dayawanti Punj Foundation, correctly shown as promoter group in the shareholding pattern.	The Company stating that shares were temporarily transmitted to nominee Mr. Uday Punj as per procedure and subsequently transferred to Pt. Kanhaya Lal Dayawanti Punj Foundation, correctly shown as promoter group in the shareholding pattern.	



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

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines 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	Management Response	Remarks
1.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17,18,19,20 & 21	Non compliance.	NSE	Email sent by NSE	Clarification sought by Stock Exchange vide email dated April 03, 2023 for non compliance with the provisions of regulation 17,18,19,20 & 21 of SEBI (LODR) Regulations, 2015	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 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.	
2.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 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	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	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)	



						ended 31st March, 2023		provisions of regulation 17,18,19,20 & 21 are not applicable presently in the Company.	Regulations 2015, the provisions of regulation 17,18,19,20 & 21 are not applicable presently in the Company.
3.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	27	Non Compliance	NSE	Email sent by NSE	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	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 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.
4.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	33	Non Compliance	BSE	Email sent by BSE	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	The Company is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and due to various unavoidable reasons there is a delay in	The Company is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and due to various unavoidable reasons



								compilation of Audited / Unaudited Financial results of the Company since Financial year ended 31.03.2019.	there is a delay in compilation of Audited / Unaudited Financial results of the Company since Financial year ended 31.03.2019	
5.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	33	Non Compliance	BSE	Email sent by 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	The Company is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and due to various unavoidable reasons there is a delay in compilation of Audited / Unaudited Financial results of the Company since Financial year ended 31.03.2019.	The Company is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, 2022 and due to various unavoidable reasons there is a delay in compilation of Audited / Unaudited Financial results of the Company since Financial year ended 31.03.2019	
6.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	27	Non Compliance	NSE	Email sent by NSE	Clarification sought by stock exchange vide email dated August 03, 2023 sought clarification for no filing of complete information in the corporate governance	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)	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	



						report prior to the quarter ended 30 th June, 2023		Regulations 2015, the provisions of regulation 17,18,19,20 & 21 are not applicable presently in the Company.	SEBI(LODR) Regulations 2015, the provisions of regulation 17,18,19,20 & 21 are not applicable presently in the Company.
7.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	27	Non Compliance	BSE	Email sent by BSE	Clarification sought by stock exchange vide Email dated September 09, 2023 for discrepancy 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 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.
8.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	27	Non Compliance	NSE	Email sent by NSE	Clarification sought by stock exchange with reference to Email dated October 18, 2023 for Discrepancy 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	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



								17,18,19,20 provisions & 21 are not applicable presently in the Company.	of regulation 17,18,19,20 & 21 are not applicable presently in the Company.
9.	The Companies Act, 2013	96	Non Compliance	BSE	Email sent by BSE	Not Holding Annual General Meeting for the Financial Year ended on 31.03.2023	Nil	The Company 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 same.	The Company 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 same..



10.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	27	Non Compliance	BSE	Email sent by BSE	Query from Exchange in relation to Periodic/event based submission /Non submission by the Company with respect to email dated January 23, 2024 for discrepancy in Corporate Governance 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 Company.	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.
11.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	27	Non Compliance	BSE	Email sent by BSE	Query from Exchange in relation to Periodic/event 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	The Company is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, and The Company has suitably replied to the Exchange.	The Company is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, and The Company has suitably replied to the Exchange.



12.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	27	Non Compliance	NSE	Email sent by NSE	Query from Exchange in relation to Periodic/event based submission /Non submission by the Company with respect to email dated February 01, 2024 for discrepancy in Corporate Governance 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 Company.	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.
13.	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	33	Non Compliance	BSE	Email sent by BSE	Query from Exchange vide email dated February 16, 2024 for non submission of Financial results for the Quarter ended December 31, 2023	Nil	The Company is under Corporate Insolvency Resolution Process from March 8, 2019 and under Liquidation as a going concern since May 27, 2022. The Company has submitted a suitable reply to the Exchange giving reason for delay/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 Company has submitted a suitable reply to the Exchange giving reason for delay/non submission of Financial results for the Quarter ended December 31, 2023



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.

**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).

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**For Deepak Dhir & Associates
Company Secretaries**



Deepak

Deepak Kumar Dhir

M. No. FCS 11633

CP No. 17296

Peer Review No. 1918/2022

Date: 26.05.2025

Place: New Delhi

UDIN: F011633G000440952