

Regd. Office: Shop No. 06, Prathamesh Avenue,
Datta Mandir Road, Malad East, Mumbai - 400097,
Maharashtra, India

Corp. Office: 101, 1st Floor, Western Edge 1,
Western Express Highway, Borivali (East),
Mumbai - 400 066, Maharashtra, India

Tel: +022 4067 6000 Website: www.esaar.in
Email: info@esaar.in

Date: May 30, 2022

To,
BSE Ltd.,
Manager (CRD),
P.J. Tower, Dalal Street,
Mumbai- 400001

BSE Scrip Code - 531 502

Name of the Company: Esaar (India) Limited

Dear Sir / Madam,

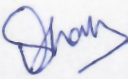
Subject: Annual Secretarial Compliance Report for the for the year ended March 31, 2022 as per Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")


Pursuant to Regulation 24A of the Listing Regulations, we hereby enclose Annual Secretarial Compliance Report issued by M/s. HD & Associates, Practicing Company Secretary for the year ended March 31, 2022.

Kindly take the same on record.

Thanking you,

For and on behalf of Esaar (India) Limited




Disha Shah
Company Secretary & Compliance Officer

Encl: a/a

HD AND ASSOCIATES COMPANY SECRETARIES

Address: Shop No. 7 Badam Wadi, Marwadi Chawl,
Grant Road (East), Mumbai - 400 004.
Email : Hardik@hdandassociates.com ; Mob.: +91-9699610825

SECRETARIAL COMPLIANCE REPORT OF ESAAR (INDIA) LTD. FOR THE YEAR ENDED MARCH 31, 2022

I, Hardik Darji, Proprietor of M/s HD & Associates have examined:

- a) all the documents and records made available to us and explanation provided by **Esaar (India) Ltd.**(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, 2022 ("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, include: -

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



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- c) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: **Not applicable to the company during the review period.**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: **Not applicable to the company during the review period.**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: **Not Applicable to the company under review period.**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013: **Not applicable to the company during the review period.**
- h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;

(Note: The aforesaid list of SEBI Regulations is only the list of regulations which were applicable to the listed entity for the review period.)

and based on the above examination, I hereby report that, during the Review Period:

- (a) The listed entity has generally 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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
Not Applicable			



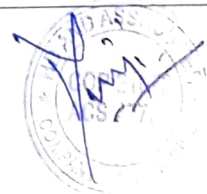
HD AND ASSOCIATES

- (b) The listed entity has 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 violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
Not Applicable				

- (d) The listed entity has taken the following actions to comply with the 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 the year ended...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				



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- a) The listed entity has complied with the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019, in terms of Para 6(A) and 6(B) of the said circular and has suitably modified the terms of appointment of its statutory auditors vide addendum letter dated November 28, 2019.

FOR HD AND ASSOCIATES
COMPANY SECRETARIES



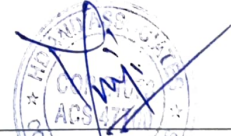
HARDIK DARJI
PRACTICING COMPANY SECRETARY
PROPRIETOR
ACS NO. 47700 C.P.NO.: 21073

PLACE: MUMBAI
DATE: 30TH MAY 2022
UDIN: A047700D000427741

Disclaimer:

1. The above report is based on the information and data available provided by the company.
2. This report is not to be construed as a compliance report of the company in any regard and it is just a compilation of the information provided by the company and is subject to typographical & human errors.

FOR HD AND ASSOCIATES
COMPANY SECRETARIES



HARDIK DARJI
PRACTICING COMPANY SECRETARY
PROPRIETOR
ACS NO. 47700 C.P.NO.: 21073