

**Date: 24.05.2022**

To,  
**Bombay Stock Exchange Limited,**  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai - 400001.

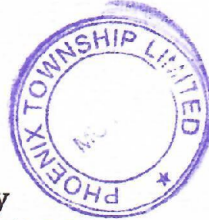
**Sub: Submission of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022**

Dear Sir,

In Compliance of regulation 24A SEBI (Listing Obligation Disclosure Requirement) Regulation, 2015 Please find the enclosed copy of Annual Secretarial Compliance Report dated 24<sup>th</sup> May, 2022.

Thanking You

**For Phoenix Township Limited**



**Richa Jain**  
**Company Secretary**  
**Membership No.: A58807**

**Place: Mumbai**

Corp. Office : Hede House,  
2nd Floor., 14, BEST Marg,  
Colaba, Mumbai - 400 001.  
Tel. : ( 91-22 ) - 6159 0900  
2283 1312, 2283 1325,  
Fax : ( 91-22 ) - 2202 8212  
customerservice@hbgingdia.com

Phoenix Park Inn Resort,  
Sequeira Vado, Candolim,  
Goa - 403515  
Tel. : (91-832) 6633 333  
Fax : (91-832) 6633 222  
ppi@sarovarhotals.com

Dr. Malbaro House,  
Rua Ismael Gracias,  
Post Office Box No. 181,  
Panaji, Goa - 403 101  
Tel.: (91-832) - 2228 217  
Fax : (91-832) - 6641 261  
E-mail : hbgoa@yahoo.co.in

REGD. OFF. : Durga Bhavan,  
Hede Centre, Tonca,  
Panaji, Goa - 403 001  
Tel. : (91-832) - 6642 724/6453 265  
Fax : (91-832) - 2461 394



**SECRETARIAL COMPLIANCE REPORT  
OF PHOENIX TOWNSHIP LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022  
[Pursuant to the Regulation 24A of SEBI (Listing Obligation and Disclosure  
Requirements) Regulation, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019  
dated February 8, 2019]**

To,  
The Board of Directors  
**PHOENIX TOWNSHIP LIMITED**

We Kothari H. & Associates, Practising Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **Phoenix Township Limited** ("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 31<sup>st</sup> March, 2022 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable for the Review Period)**
- (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 for the Review Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable for the Review Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable for the Review Period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non - Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable for the Review Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



(i) Any other regulations as applicable and circulars/ guidelines issued thereunder;

and based on the above examination, We 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:

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NIL			

(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/our 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
NIL				

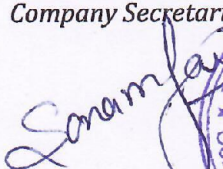
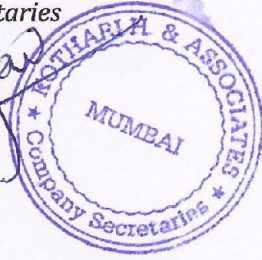
(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

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



(e) The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is **not applicable during the review period.**

For **Kothari H. & Associates**  
Company Secretaries

**Sonam Jain**  
(Partner)  
FCS No: F9871  
COP NO: 12402

**Place: Mumbai**  
**Date: 24.05.2022**

UDIN: F009871D000376336