

30th May, 2026

National Stock Exchange of India Limited [NSE] Listing Compliance 'Exchange Plaza', C/1, Block G, Bandra-Kurla Complex, Bandra (East), Mumbai – 400 051	BSE Limited (Listing Compliance) 1st Floor, New Trading Ring, Rotunda Building, P. J. Towers, Dalal Street, Fort, Mumbai – 400 001
NSE Symbol: UNITECH	Scrip Code: 507878

Subject: Submission of Secretarial Compliance Report for the financial year ended 31st March, 2026

Dear Sirs,

In compliance of regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, enclosed please find Secretarial Compliance Report issued and duly signed by Ms. Kiran Amarpuri (CP No. 7348), Practicing Company Secretary, for the financial year ended 31st March, 2026.

You are requested to take the same on record.

Thanking You,

Yours truly,
For Unitech Limited



Anuradha Mishra
Company Secretary & Compliance Officer





Kiran Amarpuri

Company Secretary in whole time practice

Cottage No. 19, 4th Floor,
West Patel Nagar, New Delhi – 110008
Phone : 96544 19297 (off)
Phone: 99111 27572 (Personal)
Email: kiranamarpuri@hotmail.com

Date: 29th May, 2026

To,

M/s. Unitech Limited,
Add : 6, Community Centre,
Saket, New Delhi-110017

Subject : Submission of Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2026 under Regulation 24A of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD 1/27/2019 dated 8th February 2019

Dear Ma'am,

With reference to the above-mentioned subject, I hereby submit the Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2026.

You are requested to take note of the same.

Thanking you,



KIRAN AMARPURI
COMPANY SECRETARY
Membership No. F-6756
CP NO. 7348



Kiran Amarpuri

Company Secretary in whole time practice

Cottage No. 19, 4th Floor,
West Patel Nagar, New Delhi – 110008
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**Secretarial Compliance Report of Unitech Limited
for the Financial Year ended 31st March, 2026**

(Pursuant to regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

I, Kiran Amarpuri, Practicing Company Secretary, have examined the following including various Circulars/ guidelines issued by the SEBI from time to time:

- (i) All the documents and records made available to me and explanation provided by Unitech Limited (“the listed Entity”);
- (ii) The filings/ submissions made by the listed Entity to the Stock Exchanges;
- (iii) Website of the listed Entity; and
- (iv) Any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March 2026 in respect of compliances with the provisions of the:
 - (a) The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the regulations, circulars, guidelines issued thereunder; and
 - (b) 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:

- (i) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (ii) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018:

Not Applicable to the Company during the Financial Year under review.

- (iii) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011:

The Hon’ble Supreme Court vide its order dated 20.01.2020 in Civil Appeal No.10856/2016 has appointed the new Management consisting of Central Government’s Nominee Directors by replacing the old Management. Further, the Hon’ble Supreme Court was also pleased to grant moratorium on proceedings,





Kiran Amarpuri

Company Secretary in whole time practice

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both existing and new. The Resolution Framework is pending for consideration before the Apex Court. Hence, in view of the above, no disclosures were made during the period under review.

- (iv) Securities and Exchange Board of India (Buy back of Securities) Regulations, 2018:

Not Applicable to the Company for the Financial Year under review.

- (v) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021:

Not Applicable to the Company for the Financial Year under review.

- (vi) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021:

Not Applicable to the Company for the Financial Year under review.

- (vii) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

- (viii) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021:

Not Applicable to the Company for the Financial Year under review.

- (ix) SEBI (Investor Protection and Education Fund) Regulations, 2009:

Not Applicable to the Company during the Financial Year under review.

- (x) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018:

Further, in terms of SEBI Circular No. SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated December 31, 2024, the requirements relating to disclosure of Employee Benefit Scheme documents under Regulation 46(2)(za) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

Not Applicable.

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:



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	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Minimum Number of Directors on the Board of Top 1000 Companies in terms of market capitalization	Regulation 17 (1) (c) of SEBI (LODR) Regulations, 2015	Board of Directors comprises of 5 Directors Only	BSE & NSE	Issue of letter	Board of Directors consists of less than 6 Directors	-	<p>Sh. Ramsekhar Manchikalapati has been appointed by the Union of India (Ministry of Corporate Affairs), with the prior approval of Hon'ble Supreme Court, granted vide MCA Order dated 02.03.2026.</p> <p>Ms. Uma Shankar resigned from the Board with effect from 07.03.2026</p>	<p>(i) All the Directors on the Board of M/s Unitech Limited have been appointed by the Union of India (Ministry of Corporate Affairs), with the prior approval of Hon'ble Supreme Court, granted vide its Orders dated 20.01.2020, 13.10.2022 and 25.02.2026.</p> <p>(ii) The Ministry of Corporate Affairs had, vide its letter bearing No. F.N.10/ 1 / 2020-Legal dated 11.10.2022 directed the Regional Director (Northern Region), Ministry of Corporate Affairs, to move an application before the Hon'ble Supreme Court in the pending matter <i>Bhupinder Singh v. Unitech Limited</i> (Civil Appeal Nos. 10856/2016) for seeking its approval for the appointment of Mr. Ramsekhar Manchikalapati as Director on the new Board of M/s Unitech Limited.</p> <p>(iii) Further to the above, the Ministry of Corporate Affairs had, vide its letter bearing No.</p>	



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									<p>F.N.10/ 1 / 2020-Legal dated 21.05.2024 also directed the Regional Director (Northern Region), Ministry of Corporate Affairs, to move an application before the Hon'ble Supreme Court for seeking its approval for the appointment of one more Director on the Board of M/s Unitech Limited.</p> <p>(iv) Subsequent to the above, the Hon'ble Supreme Court vide its order dated 25.02.2026, approved the appointment of Sh. Ramsekhar Manchikalapati and Ms. Rasika Chaubey as Directors on the Board of M/s Unitech Limited, as recommended by the MCA.</p> <p>(v) It is further informed that the MCA vide Order bearing F. No. Legal-10/1/2020-O/o DGCoA-MCA dated 02.03.2026 intimated the appointment of Sh. Ramsekhar Manchikalapati as Director on the new Board of M/s Unitech Limited with immediate effect, pursuant to the order of the Hon'ble</p>	



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									<p>Supreme Court dated 25.02.2026.</p> <p>(vi) In subsequence to the above, MCA vide its letter bearing F.N. Legal-10/1/2020-O/o DGC&A-MCA dated 25.03.2026, intimated Unitech about the resignation of Ms. Uma Shankar from the Board of Unitech w.e.f. 07.03.2026. Further, MCA also intimated the Company about the unwillingness of Ms. Rasika Chaubey to join the Board of Unitech Limited as she was holding a post as a member in Armed Forces Tribunal.</p> <p>(vii) As is clear from a perusal of the above, there are currently five (05) Directors on the BoD of M/s Unitech Limited.</p> <p>(viii) It is pertinent to mention that since all the Directors have been appointed by the Central Government in the Ministry of Corporate Affairs (MCA) pursuant to the directions of the Hon'ble Supreme Court, the appointment of Directors including composition of BoD is</p>	

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									beyond the control of the Company.	
2.	Age Limit for Non-Executive Director.	Regulation 17 (1A) of SEBI (LODR) Regulations, 2015	One of the Non-Executive Director does not comply the requirement of the Regulation	BSE & NSE	Issue of letter	A Non-Executive Director aged 75 years or more has been continued on the Board without approval of shareholders by way of special resolution.	-	The Director has been appointed by orders of Hon'ble Supreme Court	<p>(i) Out of the 05 Directors on the board of Unitech Limited as on date, this regulation is attracted only in the case of one Director i.e. Dr. Girish Kumar Ahuja.</p> <p>(ii) Dr. Girish Kumar Ahuja possesses exceptional qualifications and experience. He has earlier been a Central Government nominee Director, SBI. He is a Chartered Accountant by profession and an academician with consultancy experience in international and domestic taxation, and joint ventures.</p> <p>(iii) Further, he is currently an Independent Director on the Boards of four other listed companies. Dr. Ahuja had made seminal contribution to the management of Unitech Limited under the Supreme Court approved and Government appointed Board of Directors. By virtue of his exceptional qualifications, he is also the Chairman of the Audit</p>	Considering the peculiar circumstances of appointment by the Hon'ble Supreme Court, no immediate corrective action is within the control of the Company.

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	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
									and Risk Management Committee of Unitech Limited. (iv) Further, he being an appointee of the Central Government as a Nominee Director pursuant to the approval of the Hon'ble Supreme Court, approval of his appointment through a Special Resolution becomes meaningless as the Supreme Court orders would have an over-riding/ prevailing effect under these circumstances.	
3.	Appointment of at least one-Woman Director	Regulation 17(1)(a) of SEBI (Listing Obligations and Disclosure Requirements, 2015	No woman director on the Board post resignation of Ms. Uma Shankar	Stock Exchange	Issue of letter	The Company does not have a woman director on its Board w.e.f. 07.03.2026 consequent to resignation of Ms. Uma Shankar.	-	Ms. Uma Shankar resigned from the Board with effect from 07.03.2026. The Company is currently not compliant with the requirement of having at least one woman director under Regulation 17(1)(a).	(i) The Chairman & Managing Director, Unitech Group of Companies, vide his email dated 25.03.2026, has intimated MCA about the requirement of a woman Director on the Board of Unitech Limited, being a listed Company in place of Ms. Uma Shankar, who has resigned w.e.f. 07.03.2026. (ii) He has vide the aforesaid email requested MCA to place the matter for consideration before the Hon'ble Supreme Court.	Consequent to resignation of Ms. Uma Shankar on 07.03.2026, the Company presently does not have a woman Director. Since all appointments are made by the Union of India with prior approval of the Hon'ble Supreme Court, the Company is not in a position to



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										independently comply.



(b) M/s Unitech Limited has taken the following action to comply with the observations issued by me in previous reports:

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ...	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	No fine is prescribed pursuant to SEBI Circular No. SEBI/HO/CFD/CMD/IR/P/2018/77 dt. 3 rd May, 2018.	2020 to 2025	Regulation 23(9) of SEBI (LODR) Disclosure of related party transactions on consolidated basis within 30 days from the date of publication of results for half year ended on 31.03.2019; Due date was 18.08.2019.	Not Submitted	No action taken	<p>No action has been taken by the company.</p> <p>Management's explanation is reproduced below</p> <p>Till March 2019, the Company was following the practice of preparing Related Party Transactions on an annual basis for the purpose of Annual Financial Statements of the Company. The requirement of half yearly RPT disclosure was made effective from the half year ended March 31, 2019, pursuant to amendments in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.</p> <p>The financials for this period were prepared by the erstwhile Management. The RPT for the half year ended 31st March, 2019 was neither prepared nor was it submitted with the Stock Exchanges. However, it is to inform that all necessary steps are now being taken by the new Management to ensure that the Entity becomes compliant in all respects. The Company is making all possible efforts to file all documents/ reports to the Stock Exchanges under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 within the prescribed timelines.</p>
2.	Financial Results have been submitted on 09.11.2020. Fine paid	2020 to 2025	Regulation 33 of SEBI (LODR) Preparation, approval, submission	Submitted on 09.11.2020	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the	No further action is required to be taken.



Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ...	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
	by the Company pursuant to invoices raised by NSE & BSE, both for the period up to 20 th December 2019.		and publication of Financial Results for the quarter ended on 30.09.2019.		designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926-46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	
3.	No fine is prescribed pursuant to SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2018/77 dated 3 rd May, 2018.	2020 to 2025	Regulation 23(9) of SEBI (LODR) Disclosure of related party transactions within 30 days from the date of publication of results for half year ended on 30.09.2019.	Not submitted	No action taken	No action has been taken by the company. Management's explanation is reproduced below The said non-compliance pertains to the period of the erstwhile Management, which has since been superseded by the Hon'ble Supreme Court vide its order dated 20.01.2020. The new Management is taking all necessary steps to ensure that the Company becomes fully compliant in all respects, for which all possible efforts are being made to file all documents/ reports to the Stock Exchanges under the SEBI (LODR) Regulations, 2015 within the prescribed timelines.



Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ...	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
						Further, the Company is now fully updated and compliant with respect to the requisite disclosures of Related Party Transactions to the Exchanges. As far as the disclosure of Related Party Transactions for the half years ended 30.09.2025 and 31.03.2026 is concerned, it is pointed out that it has already been submitted to the Exchanges within the stipulated timelines.
4.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020 / 12 dt. 22nd January, 2020	2020 to 2025	Regulation 33 of SEBI (LODR) Preparation, approval, submission and publication of Financial Results for the quarter ended on 31.12.2019 Due date was 14.02.2020.	Submitted on 09.11.2020	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926-46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	No further action is required to be taken.
5.	The Company has not paid fine in terms of Circular No. SEBI/HO/	2021 to 2025	Regulation 31 of SEBI (LODR) Delay in submission of Quarterly Share holding pattern for the Quarter ended on 31.03.2020; Due	Submitted on 08.06.2020	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on	No further action is required to be taken.



Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ...	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
	CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020		date was 21.04.2020, which was further extended up to 15.05.2020.		16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	
6.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	2021 to 2025	Regulation 33 of SEBI (LODR) Submission of audited financial results for quarter and year ended 31.03.2020; Due date was 30.05.2020 which was further extended up to 31.07.2020.	Submitted on 09.11.2020	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	No further action is required to be taken.



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7.	No fine is prescribed under SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	2021 to 2025	Regulation 23(9) of SEBI (LODR) Disclosure of related party transactions within 30 days from the date of publication of results for half year ended 31.03.2020. Due date was 09.12.2020.	Not Submitted	No action taken	<p>No action has been taken by the company></p> <p>Management's explanation is reproduced below</p> <p>The said non-compliance pertains to the period of the erstwhile Management, since superseded by the Hon'ble Supreme Court vide its order dated 20.01.2020.</p> <p>The new Management is taking all necessary steps to ensure that the Company becomes fully compliant in all respects, for which all possible efforts are being made to file all documents/ reports to the Stock Exchanges under the SEBI (LODR) Regulations, 2015 within the prescribed timelines.</p> <p>Further, the Company is now fully updated and compliant with respect to the requisite disclosures of Related Party Transactions to the Exchanges. As far as the disclosure of Related Party Transactions for the half years ended 30.09.2025 and 31.03.2026 is concerned, it is pointed out that it has already been submitted to the Exchanges within the stipulated timelines.</p>
8.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/202	2021 to 2025	Regulation 33 of SEBI (LODR) Submission of financial results for the quarter ended 30.06.2020; Due date was 14.08.2020 which was further extended up to 14.09.2020.	Submitted on 23.03.2022	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was	No further action is required to be taken.



Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ...	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
	0/ 12 dt. 22 nd January, 2020				thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	
9.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020	2021 to 2025	Regulation 33 of SEBI (LODR) Submission of financial results for the quarter ended 30.09.2020; Due date was 14.11.2020.	Submitted on 08.06.2022	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	No further action is required to be taken.

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ...	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
10.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	2021 to 2025	Regulation 31 of SEBI (LODR) Submission of Quarterly Share holding pattern for the Quarter ended on 31.12.2020; Due date was 21.01.2021	Submitted on 14.04.2021	<ul style="list-style-type: none"> (i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024. 	No further action is required to be taken.
11.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	2021 to 2025	Regulation 33 of SEBI (LODR) Submission of financial results for the quarter ended 31.12.2020; Due date was 14.02.2021	Submitted on 08.06.2022	<ul style="list-style-type: none"> (i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 	No further action is required to be taken.



Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ...	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
					dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	
12.	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	2022 to 2025	Regulation 24A of SEBI (LODR) Submission of Secretarial Compliance Report for the period March 2021 within the prescribed time. Original Due date was 30.05.2021. which was further extended up to 30.06.2021.	Submitted on 01.07.2021	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	No further action is required to be taken.
13.	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	2022 to 2025	Regulation 33 of SEBI (LODR) Submission of Financial Results for the quarter and year ended on 31.03.2021. Due date was 30 th May 2021 which was further extended up to 30.06.2021.	Submitted on 08.06.2022.	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.	No further action is required to be taken.



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					(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	
14.	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	2022 to 2025	Regulation 34 of SEBI (LODR) Submission of Annual Report for the year ended on March 2021 within the prescribed time (not later than the day of commencement of dispatch to its shareholders).	Submitted on 15.06.2022	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	No further action is required to be taken.
15.	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/	2022 to 2025	Regulation 33 of SEBI (LODR) Submission of Financial Results for the quarter ended on 30.06.2021. Due date was 14.08.2021	Submitted on 14.09.2022	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on	No further action is required to be taken.

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	CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.				<p>16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.</p> <p>(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.</p>	
16.	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/ 12 dt. 22 nd January, 2020.	2022 to 2025	Regulation 27(2) of SEBI (LODR) Submission of Corporate Governance Report for the quarter ended on 30.09.2021. Due date was 21.10.2021.	Submitted on 11.01.2023	<p>(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.</p> <p>(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.</p>	No further action is required to be taken.



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17.	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22 nd January, 2020.	2022 to 2025	Regulation 33 of SEBI (LODR) Submission of Financial Results for the quarter and half year ended on 30.09.2021. Due date was 14.11.2021	Submitted on 28.02.2023	<p>(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.</p> <p>(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.</p>	No further action is required to be taken.
18.	The Company has not paid fine in terms of SEBI Cir. No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22 nd January, 2020.	2022 to 2025	Regulation 33 of SEBI (LODR) Submission of Financial Results for the quarter and nine months ended on 31.12.2021 Regulations, 2015. Due date was 14.02.2022.	Submitted on 28.02.2023	<p>(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.</p> <p>(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076</p>	No further action is required to be taken.



Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ...	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
					dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	
19.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated 22 nd January, 2020.	2023 to 2025	Regulation 33 of SEBI (LODR) Submission of Financial Results for the quarter and year ended on 31.03.2022. Due date was 30.05.2022.	Submitted on 28.02.2023	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	No further action is required to be taken.
20.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated 22 nd January, 2020.	2023 to 2025	Regulation 24A of SEBI (LODR) Regulations, 2015 Submission of Secretarial Compliance Report. Due date was 30.05.2022	Report in PDF format was submitted on 02.06.2023.	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.	No further action is required to be taken.



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					(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	
21.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/ CIR/ P/2020/12 dated 22 nd January, 2020.	2023 to 2025	Regulation 27(2) of SEBI (LODR) Submission of Corporate Governance Report for the quarter ended on 31.03.2022. Due date was 21.04.2022	Submitted on 11.01.2023	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	No further action is required to be taken.
22.	The Company has not paid fine in terms of Circular No. SEBI/HO/ CFD/	2023 to 2025	Regulation 33 of SEBI (LODR) Submission of Financial Results for the quarter ended on 30.06.2022. Due date was 14.08.2022	Submitted on 21.12.2023	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on	No further action is required to be taken.



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	CMD/CIR/P/2020/12 dt. 22 nd January, 2020.				<p>16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.</p> <p>(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.</p>	
23.	The Company has not paid fine in terms of Circular No. SEBI/HO/ CFD/ CMD/CIR/P/2020/12 dt. 22 nd January, 2020.	2023 to 2025	Regulation 27(2) of SEBI (LODR) Submission of Corporate Governance Report for the quarter ended on September 2022.	Submitted on 12.01.2023	<p>(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.</p> <p>(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.</p>	No further action is required to be taken..



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24.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22 nd January, 2020.	2023 to 2025	Regulation 33 of SEBI (LODR) Submission of the Financial Results for the quarter ended on September 2022. Due date was 14.11.2022	Submitted on 29.08.2023	<p>(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.</p> <p>(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.</p>	No further action is required to be taken.
25.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22 nd January, 2020.	2023 to 2025	Regulation 34 of SEBI (LODR) Submission of Annual Report for the year ended on March 2022. Due date was 08.03.2023	Submitted on 09.03 2023.	<p>(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.</p> <p>(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076</p>	No further action is required to be taken.



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					dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	
26.	The Company has not paid fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dt. 22 nd January, 2020.	2023 to 2025	Regulation 33 of SEBI (LODR) Submission of the Financial Results for the quarter ended on December 2022. Due date was 14.02.2023	Submitted on 29.08.2023	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	No further action is required to be taken.
27.	The Company was required to submit the Report.	2021 to 2025	Regulation 34(2)(f) of SEBI (LODR) Being one of the top one thousand listed entities based on market capitalization, Business Responsibility Report is required to be enclosed with Annual report for the period ended on 31.03.2021.	Not Disclosed	No action taken	No action has been taken by the company. Management's explanation is reproduced below When the new Board of Directors took over, in supersession of the erstwhile Management, there were a string of non-compliances under various applicable laws which the new Management inherited from the superseded Management.



Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ...	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
						<p>The new Management, however, has managed to submit the Business Responsibility and Sustainability Report for the FY 2021-22 as a part of the Annual Report for the year ended on 31.03.2022.</p> <p>The new Management is fully conscious of its obligations and is committed to make all possible efforts to ensure that filings are made within the prescribed timelines in future.</p>
28.	Minimum Number of Directors	2024 and 2025	Regulation 17 (1) (c) of SEBI (LODR) Regulations, 2015, Minimum Number of Directors on the Board of the Top 2000 Companies in terms of market capitalization.	Board of Directors consist of less than 6 Directors	Since all the Directors on the Board of M/s Unitech Limited have been appointed by the Central Government in the Ministry of Corporate Affairs (MCA) pursuant to the directions of the Hon'ble Supreme Court, the appointment of Directors including composition of BoD is beyond the control of the Company.	No fine was imposed as the Directors are to be appointed by the MCA pursuant to the orders of Hon'ble Supreme Court.
29.	Age Limit of Non-Executive Director	2024 and 2025	Regulation 17 (1A) of SEBI (LODR) Regulations, 2015 Age Limit for Non-Executive Director.	One of the Non-Executive Director does not comply with the age requirement of the Regulations.	<p>(i) Out of the 05 Directors on the board of Unitech Limited as on date, this regulation is attracted only in the case of one Director i.e. Dr. Girish Kumar Ahuja.</p> <p>(ii) Dr. Girish Kumar Ahuja possesses exceptional qualifications and experience. He has earlier been a Central Government nominee Director, SBI. He is a Chartered Accountant by profession and an academician with consultancy experience in international</p>	No fine was imposed as the Director was appointed by the Union Government in Ministry of Corporate Affairs pursuant to order of Hon'ble Supreme Court dated 20.01.2020.

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					<p>and domestic taxation, and joint ventures.</p> <p>(iii) Further, he is currently an Independent Director on the Boards of four other listed companies. Dr. Ahuja had made seminal contribution to the management of Unitech Limited under the Supreme Court approved and Government appointed Board of Directors. By virtue of his exceptional qualifications, he is also the Chairman of the Audit and Risk Management Committee of Unitech Limited.</p> <p>(iv) Further, he being an appointee of the Central Government as a Nominee Director pursuant to the approval of the Hon'ble Supreme Court, approval of his appointment through a Special Resolution becomes meaningless as the Supreme Court orders would have an over-riding/ prevailing effect under these circumstances.</p>	
30.	The Company has not paid fine in terms of SEBI Master Circular No. SEBI/HO/ CFD/ PoD2/CIR/P/2023/120 dated 11 th July, 2023.	2024 and 2025	Regulation 33 of SEBI (LODR) Regulations, 2015 Submission of Financial Results for the quarter and year ended 31.03.2023. Due date was 30.05.2023.	Submitted on 29.08.2023	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps.	No further action is required to be taken.



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					(ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	
31.	The Company has not paid fine in terms of SEBI Master Circular No. SEBI/HO/ CFD/ PoD2/CIR/P/2023/120 dt. 11 th July, 2023	2024 and 2025	Regulation 33 of SEBI (LODR) Submission of Financial Results for the quarter ended on 30.06.2023. Due date was 14.08.2023.	Submitted on 21.12.2023.	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on 16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	No further action is required to be taken.
32.	The Company has not paid fine in terms of SEBI Master Circular No. SEBI/HO/ CFD/	2024 and 2025	Regulation 33 of SEBI (LODR) Regulations, 2015 Submission of Financial Results for	Submitted on 21.12.2023.	(i) A waiver application was filed by M/s Unitech Limited with BSE Ltd. (BSE) through its Listing Centre, being the designated Stock Exchange, on	No further action is required to be taken.



Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ...	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
	PoD2/CIR/P/2023/120 dt. 11 th July, 2023.		the quarter ended on 30.09.2023. Due date was 14.11.2023.		16.09.2026. The said application was thereafter also filed with National Stock Exchange of India Ltd. (NSE) through Neaps. (ii) The penalty was waived off by BSE vide its e-mail dated 26.09.2025 (Notice No. 20250926 46 dated 26.09.2025) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025 (Circular Ref. No:1851/2025 dated. 26.09.2025), pursuant to SEBI Master Circular dated 11.11.2024.	

General Note: It is noted that certain fines levied by the Stock Exchanges for past non-compliances have been waived off vide waiver letters issued by BSE dated 26.09.2025 and NSE dated 01.10.2025. Accordingly, the same has been reflected in the column (Comments of the PCS on the action taken by the listed entity) of this Report.

(c) I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	No remarks are required
2.	Adoption and timely updation of the Policies: All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities	Yes	<i>Policies are required to be aligned with requirements of national and/or international standards of Business Responsibility & Sustainability Reporting</i>



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
	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		
3.	Maintenance and disclosures on Website: 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 redirects to the relevant document(s)/ section of the website	Yes	No remarks are required
4.	Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	No remarks are required.
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes Yes	Compliances related to one of the material subsidiaries of the Company is pending for want of appointment of Independent Director on its Board.
6.	Preservation of Documents: 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.	Yes	No remarks are required.
7.	Performance Evaluation: 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.	No	<i>Performance evaluation of Directors and Independent Directors and Committees have not been conducted</i>
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (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.	Yes	No remarks are required
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	While the Company has generally complied with Regulation 30 of SEBI (LODR) Regulations, 2015, certain disclosures were made with delay. The management has acknowledged these instances and assured that steps are being taken to strengthen internal monitoring and ensure timely disclosures going forward.
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	No remarks are required
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 (**).	Yes	Certain historical penalties were waived by BSE vide waiver letter dated 26.09.2025 (Notice No. 20250926-46) and by NSE vide waiver letter Ref. No. NSE/LIST/SOP/1076 dated 01.10.2025,



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
			pursuant to SEBI Master Circular dated 11.11.2024.
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries No case of resignation of statutory auditor is observed	NA	No remarks are required
13.	No additional non-compliances observed.	NA	<i>No additional non-compliance observed for any SEBI regulation/circular/ guidance note etc.</i>



Kiran Amarपुरi
Practicing Company Secretary
FCS- 6756/PCS – 7348

Place: New Delhi

Date: 29th May, 2026

UDIN: Foo6756H000534514

Note: This report is to be read with our letter of even date which is annexed as '**Annexure - A**' and forms an integral part of this report.



Kiran Amarpuri

Company Secretary in whole time practice

Cottage No. 19, 4th Floor,
West Patel Nagar, New Delhi – 110008
Phone : 96544 19297 (off)
Phone: 99111 27572 (Personal)
Email: kiranamarpuri@hotmail.com

Annexure - A

To,

M/s. Unitech Limited
6, Coomunity Centre, Saket
New Delhi - 110017

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

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 certify 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 Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.
5. It is the responsibility of the Company's management to maintain records and establish appropriate systems for ensuring compliance with applicable SEBI Regulations, circulars, and guidelines issued from time to time and to ensure the adequacy and operational effectiveness of such systems.



Kiran Amarpuri
Practicing Company Secretary
FCS- 6756/PCS – 7348
UDIN: F006756H000534514

Place: New Delhi
Date: 29th May, 2026