

# ABHA PROPERTY PROJECT LIMITED

29, GANESH CHANDRA AVENUE, 4<sup>TH</sup> FLOOR, ROOM NO 407,  
KOLKATA- 700013

April 22, 2025

To,  
The Secretary  
The Calcutta Stock Exchange Ltd.  
7, Lyons Range  
Kolkata – 700 001  
Script Code: 11594

**Sub: Compliance Report on Corporate Governance for the year ended**  
**31<sup>st</sup> March, 2025**

Dear Sir/Madam,

In terms of Regulation 27(2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the Circular No. SEBI/HO/CFD/CMD-2/P/CIR/2021/567 dated 31<sup>st</sup> May, 2021, issued by SEBI, a Compliance Report on Corporate Governance for the year ended on 31<sup>st</sup> March, 2025 is enclosed and marked as **Annexure I**.

Please acknowledge receipt.

Thanking you,

Yours faithfully,

For ABHA PROPERTY PROJECT LIMITED

  
Santanu Kumar Hazra  
Company Secretary



Encl: As above

## Compliance Report on Corporate Governance

1. Name of Listed Entity: Abha Property Project Limited
2. Quarter ending: 31st March, 2025

### I. Composition of Board of Directors

| Title<br>(Mr./<br>Ms.) | Name of the Director | PAN & DIN                           | Category<br>(Chairperson/Exec<br>utive/Non-<br>Executive<br>/Independent/No<br>minee) | Initial Date of<br>Appointment | Date of Re-<br>appointment | Date of Cessation | Tenure (in<br>Months) | Date of Birth | Whether special<br>resolution<br>Passed?<br>[Refer Reg.<br>17(1A) of Listing<br>Regulations] | Date of passing<br>special<br>resolution | No. Of<br>directorship in<br>listed entities<br>including this<br>listed entity<br>[in reference to<br>Regulation<br>17A(1)] | No of<br>Independent<br>Directorship in<br>listed entities<br>including this<br>listed entity<br>[in reference to<br>proviso to<br>regulation<br>17A(1)] | Number of<br>memberships in<br>Audit/<br>Stakeholder<br>Committee(s)<br>including this<br>listed entity<br>(Refer Regulation<br>26(1) of Listing<br>Regulations) | No. of post of<br>Chairperson in<br>Audit/Stakeholder<br>Committee held in<br>listed entities<br>including this<br>listed entity<br>(Refer Regulation<br>26(1) of Listing<br>Regulations) |
|------------------------|----------------------|-------------------------------------|---------------------------------------------------------------------------------------|--------------------------------|----------------------------|-------------------|-----------------------|---------------|----------------------------------------------------------------------------------------------|------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mr.                    | Vishal Agarwalla     | PAN:ACMPA9306<br>M DIN: 00129040    | Non-Executive                                                                         | 14-04-2003                     | -                          | -                 | 262                   | 16-09-1971    | N/A                                                                                          | -                                        | 1                                                                                                                            | 0                                                                                                                                                        | 1                                                                                                                                                                | 1                                                                                                                                                                                         |
| Mr.                    | Amit Agarwalla       | PAN:ACMPA9303<br>Q DIN: 00338081    | Executive                                                                             | 14-08-2017                     | 01-06-2024                 | -                 | 90                    | 27-08-1971    | N/A                                                                                          | -                                        | 1                                                                                                                            | 0                                                                                                                                                        | 1                                                                                                                                                                | 0                                                                                                                                                                                         |
| Mr.                    | Sumit Agarwalla      | PAN: ACMPA9292J<br>DIN: 00336064    | Non-Executive                                                                         | 14-07-2003                     | -                          | -                 | 259                   | 06-12-1972    | N/A                                                                                          | -                                        | 1                                                                                                                            | 0                                                                                                                                                        | 0                                                                                                                                                                | 0                                                                                                                                                                                         |
| Mr.                    | Aditya Agarwalla     | PAN:<br>ACMPA9304K DIN:<br>00140683 | Executive                                                                             | 14-08-2017                     | -                          | -                 | 90                    | 28-12-1974    | N/A                                                                                          | -                                        | 1                                                                                                                            | 0                                                                                                                                                        | 1                                                                                                                                                                | 0                                                                                                                                                                                         |
| Ms.                    | Mandeep Kaur Jaiswal | PAN:<br>BWHPK8912P<br>DIN: 10077160 | Non-Executive-<br>Independent                                                         | 29-05-2023                     | -                          | -                 | 23                    | 26-05-1990    | N/A                                                                                          | -                                        | 4                                                                                                                            | 4                                                                                                                                                        | 2                                                                                                                                                                | 1                                                                                                                                                                                         |
| Ms.                    | Ayushi Khaitan       | PAN:<br>GHGPK4103M<br>DIN: 10171829 | Non-Executive-<br>Independent                                                         | 29-05-2023                     | -                          | -                 | 23                    | 06-09-1993    | N/A                                                                                          | -                                        | 2                                                                                                                            | 2                                                                                                                                                        | 2                                                                                                                                                                | 0                                                                                                                                                                                         |

Whether Regular chairperson appointed : No

Whether Chairperson is related to managing director or CEO : No

Notes:



## II. Composition of Committees

| Name of Committee                            | Whether Regular chairperson appointed | Name of Committee Members                                                     | Category (Chairperson/ Executive/ Non-Executive/ Independent/ Nominee)                               | Date of Appointment                                  | Date of Cessation |
|----------------------------------------------|---------------------------------------|-------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|------------------------------------------------------|-------------------|
| 1. Audit Committee                           | Yes                                   | Mandeep Kaur Jaiswal<br>Ayushi Khaitan<br>Aditya Agarwalla                    | Chairperson-Non-Executive-Independent<br>Non-Executive-Independent<br>Executive                      | 29-05-2023<br>29-05-2023<br>14-08-2017               | -<br>-<br>-       |
| 2. Nomination & Remuneration Committee       | Yes                                   | Mandeep Kaur Jaiswal<br>Ayushi Khaitan<br>Sumit Agarwalla<br>Vishal Agarwalla | Chairperson-Non-Executive-Independent<br>Non-Executive-Independent<br>Non-Executive<br>Non-Executive | 29-05-2023<br>29-05-2023<br>31-03-2015<br>31-03-2015 | -<br>-<br>-<br>-  |
| 3. Risk Management Committee                 | NA                                    |                                                                               | Not Applicable                                                                                       |                                                      |                   |
| 4. Stakeholders Relationship Committee       | Yes                                   | Vishal Agarwalla<br>Amit Agarwalla                                            | Chairman-Non-Executive<br>Executive                                                                  | 29-06-2021<br>29-06-2021                             | -<br>-            |
| 5. Corporate Social Responsibility Committee | NA                                    | Mandeep Kaur Jaiswal                                                          | Non-Executive-Independent                                                                            | 29-05-2023                                           | -                 |

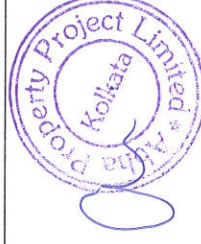
## III. Meeting of Board of Directors

| Date(s) of Meeting (if any) in the previous quarter | Date(s) of Meeting (if any) in the relevant quarter | Whether requirement of Quorum met | Number of Directors present | Number of independent directors present | Maximum gap between any two consecutive meetings (in number of days) |
|-----------------------------------------------------|-----------------------------------------------------|-----------------------------------|-----------------------------|-----------------------------------------|----------------------------------------------------------------------|
| 12-11-2024                                          | 13-02-2025                                          | Yes                               | 6                           | 2                                       | 92                                                                   |
| 12-11-2024                                          | 04-03-2025                                          | Yes                               | 6                           | 2                                       | 111                                                                  |
| 21-12-2024                                          | 13-02-2025                                          | Yes                               | 6                           | 2                                       | 53                                                                   |
| 21-12-2024                                          | 04-03-2025                                          | Yes                               | 6                           | 2                                       | 72                                                                   |

## IV. Meeting of Committees

| Date(s) of meeting of the committee in the relevant quarter | Whether requirement of Quorum met (details) <sup>1)</sup> | Number of Directors present | Number of independent directors present | Date(s) of meeting of the committee in the previous quarter | Maximum gap between any two consecutive meetings in number of days |
|-------------------------------------------------------------|-----------------------------------------------------------|-----------------------------|-----------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------|
| Audit Committee                                             |                                                           |                             |                                         |                                                             |                                                                    |
| 13-02-2025                                                  | Yes                                                       | 3                           | 2                                       | 12-11-2024                                                  | 92                                                                 |
| 13-02-2025                                                  | Yes                                                       | 3                           | 2                                       | 21-12-2024                                                  | 53                                                                 |
| Stakeholders Relationship Committee                         |                                                           |                             |                                         |                                                             |                                                                    |
| -                                                           | Yes                                                       | -                           | -                                       | -                                                           | NA                                                                 |
| Nomination and Remuneration Committee                       |                                                           |                             |                                         |                                                             |                                                                    |
| -                                                           | Yes                                                       | -                           | -                                       | -                                                           | NA                                                                 |
| Corporate Social Responsibility Committee                   |                                                           |                             |                                         |                                                             |                                                                    |
| -                                                           | NA                                                        |                             |                                         |                                                             | NA                                                                 |
| Risk Management Committee                                   |                                                           |                             |                                         |                                                             |                                                                    |
| -                                                           | NA                                                        |                             |                                         |                                                             | NA                                                                 |

Note: In pursuance of the Board of Directors meeting held on 29th May, 2023, a rights issue committee of the Board comprises with 3 members out of which 2 Executive Directors & 1 Company Secretary (KMP) were formed to look after the routine responsibilities w.r.t. the proposed rights issue of the equity shares by the Company. This is an non-statutory committee.



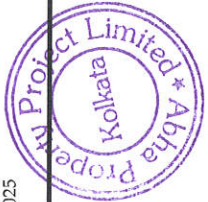
| V. Related Party Transactions                                                                          | Subject | Compliance status (Yes/No/NA) |
|--------------------------------------------------------------------------------------------------------|---------|-------------------------------|
| Whether prior approval of audit committee obtained                                                     |         | Yes                           |
| Whether shareholder approval obtained for material RPT                                                 |         | Yes                           |
| Whether details of RPT entered into pursuant to omnibus approval have been reviewed by Audit Committee |         | Yes                           |

**VI. Affirmations**

- The composition of Board of Directors is in terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
- The composition of the following Committees is in terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
  - Audit Committee
  - Nomination & Remuneration Committee
  - Stakeholders Relationship Committee
  - Risk Management Committee (Not applicable)
  - Corporate Social Responsibility Committee (Not applicable)
- The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- The meetings of the Board of Directors and the above Committees have been conducted in the manner as specified in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- The report submitted for the quarter ended 31.12.2024 has been placed before Board of Directors in its meeting held on 13th February, 2025.
- This report will be placed before the Board of Directors in the upcoming Board Meeting.

For Abha Property Project Limited

*Aditya Agarwalla*  
 Aditya Agarwalla  
 Director & Chief Financial Officer  
 DIN: 00140683  
 Date: 15th April, 2025  
 Place: Kolkata

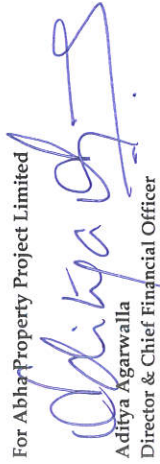


ANNEXURE II

Compliance Report on Corporate Governance at the end of Six months ended 31st March, 2025.

| I Affirmations                                                                                                                                                                 | Regulation Number                    | Compliance Status (Yes/No/NA) |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|-------------------------------|
| <b>Broad Heading</b>                                                                                                                                                           |                                      |                               |
| Copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report, business responsibility report displayed on website | 46(2)                                | Yes                           |
| Presence of Chairperson of Audit Committee at the Annual General Meeting                                                                                                       | 18(1)(d)                             | Yes                           |
| Presence of Chairperson of the Nomination and Remuneration Committee at the Annual General Meeting                                                                             | 19(3)                                | Yes                           |
| Presence of Chairperson of the Stakeholder Relationship Committee at the Annual General Meeting                                                                                | 20(3)                                | Yes                           |
| Whether "Corporate Governance Report" disclosed in Annual Report                                                                                                               | 34(3) read with para C of Schedule V | Yes                           |

For Abha Property Project Limited

  
Aditya Agarwalla  
Director & Chief Financial Officer

DIN: 00140683

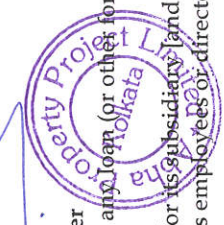
Date: 15th April, 2025

Place: Kolkata



## Compliance Report on Corporate Governance on half year basis i.e. for the second half of the FY 2024-25.

Half year ending - 31st March, 2025.

| I. Disclosure of Loans / guarantees / comfort letters / securities etc. (refer note below)                                                                                                                                                                                                                                                                                                                                  |                                                                           |                                                        |                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|--------------------------------------------------------|-----------------------------------------------------------------------------------|
| Entity                                                                                                                                                                                                                                                                                                                                                                                                                      | Aggregate amount advanced by the listed entity directly or indirectly to: | Aggregate amount advanced during six months            | Balance outstanding at the end of six months                                      |
| Promoter or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                             |                                                                           | Nil                                                    | Nil                                                                               |
| Promoter Group or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                       |                                                                           | Nil                                                    | Nil                                                                               |
| Directors (including relatives) or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                      |                                                                           | Nil                                                    | Nil                                                                               |
| KMPs or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                                 |                                                                           | Nil                                                    | Nil                                                                               |
| (B) Any guarantee/ comfort letter (by whatever name called) provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:                                                                                                                                                                                                                                      |                                                                           |                                                        |                                                                                   |
| Entity                                                                                                                                                                                                                                                                                                                                                                                                                      | Type (guarantee, comfort letter etc.)                                     | Aggregate amount of issuance during six months         | Balance outstanding at the end of six months (taking into account any invocation) |
| Promoter or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                             | Nil                                                                       | Nil                                                    | Nil                                                                               |
| Promoter Group or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                       | Nil                                                                       | Nil                                                    | Nil                                                                               |
| Directors (including relatives) or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                      | Nil                                                                       | Nil                                                    | Nil                                                                               |
| KMPs or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                                 | Nil                                                                       | Nil                                                    | Nil                                                                               |
| (C) Any security provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:                                                                                                                                                                                                                                                                                 |                                                                           |                                                        |                                                                                   |
| Entity                                                                                                                                                                                                                                                                                                                                                                                                                      | Type of security (cash, shares etc.)                                      | Aggregate value of security provided during six months | Balance outstanding at the end of six months                                      |
| Promoter or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                             | Nil                                                                       | Nil                                                    | Nil                                                                               |
| Promoter Group or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                       | Nil                                                                       | Nil                                                    | Nil                                                                               |
| Directors (including relatives) or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                      | Nil                                                                       | Nil                                                    | Nil                                                                               |
| KMPs or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                                 | Nil                                                                       | Nil                                                    | Nil                                                                               |
| II. Affirmations:                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                           |                                                        |                                                                                   |
| All loans (or other form of debt), guarantees, comfort letters (by whatever name called) or securities in connection with any loan(s) (or other form of debt) given directly or indirectly by the listed entity to promoter(s), promoter group, director(s) (including their relatives), key managerial personnel (including their relatives) or any entity controlled by them are in the economic interest of the company. |                                                                           |                                                        |                                                                                   |
| For Abha Property Project Limited                                                                                                                                                                                                                                                                                                                                                                                           |                                                                           |                                                        |                                                                                   |
| <br>Aditya Agarwalla<br>Director & Chief Financial Officer                                                                                                                                                                                                                                                                             |                                                                           |                                                        |                                                                                   |
|                                                                                                                                                                                                                                                                                                                                        |                                                                           |                                                        |                                                                                   |
| Note: These disclosures excludes any loan (or other form of debt), guarantee / comfort letter (by whatever name called) or security provided in connection with any loan or any other form of debt:                                                                                                                                                                                                                         |                                                                           |                                                        |                                                                                   |
| a) by the Company to /for its subsidiary [and joint-venture company] whose accounts are consolidated with the Company.<br>b) by the Company to its employees or directors as a part of the service conditions.                                                                                                                                                                                                              |                                                                           |                                                        |                                                                                   |

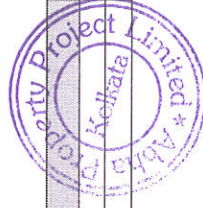
| Annexure IV                                                                                                     |                                                                                                                                                                                        |                               |                                                                |                         |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|----------------------------------------------------------------|-------------------------|
| Annexure IV to be submitted by listed entity at the end of the financial year (for the whole of financial year) |                                                                                                                                                                                        |                               |                                                                |                         |
| I. Disclosure on website in terms of Listing Regulations                                                        |                                                                                                                                                                                        |                               |                                                                |                         |
| Sr                                                                                                              | Item                                                                                                                                                                                   | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. | Web address             |
| 1                                                                                                               | Details of business                                                                                                                                                                    | Yes                           |                                                                | https://abhproperty.in/ |
| 2                                                                                                               | Terms and conditions of appointment of independent directors                                                                                                                           | Yes                           |                                                                | https://abhproperty.in/ |
| 3                                                                                                               | Composition of various committees of board of directors                                                                                                                                | Yes                           |                                                                | https://abhproperty.in/ |
| 4                                                                                                               | Code of conduct of board of directors and senior management personnel                                                                                                                  | Yes                           |                                                                | https://abhproperty.in/ |
| 5                                                                                                               | Details of establishment of vigil mechanism/ Whistle Blower policy                                                                                                                     | Yes                           |                                                                | https://abhproperty.in/ |
| 6                                                                                                               | Criteria of making payments to non-executive directors                                                                                                                                 | Yes                           |                                                                | https://abhproperty.in/ |
| 7                                                                                                               | Policy on dealing with related party transactions                                                                                                                                      | Yes                           |                                                                | https://abhproperty.in/ |
| 8                                                                                                               | Policy for determining 'material' subsidiaries                                                                                                                                         | Yes                           |                                                                | https://abhproperty.in/ |
| 9                                                                                                               | Details of familiarization programmes imparted to independent directors                                                                                                                | Yes                           |                                                                | https://abhproperty.in/ |
| 10                                                                                                              | Email address for grievance redressal and other relevant details                                                                                                                       | Yes                           |                                                                | https://abhproperty.in/ |
| 11                                                                                                              | Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances                                                | Yes                           |                                                                | https://abhproperty.in/ |
| 12                                                                                                              | Financial results                                                                                                                                                                      | Yes                           |                                                                | https://abhproperty.in/ |
| 13                                                                                                              | Shareholding pattern                                                                                                                                                                   | Yes                           |                                                                | https://abhproperty.in/ |
| 14                                                                                                              | Details of agreements entered into with the media companies and/or their associates                                                                                                    | NA                            |                                                                |                         |
| 15.1                                                                                                            | Schedule of analyst or institutional investor meet and presentations made by the listed entity to analysts or institutional investors simultaneously with submission to stock exchange | NA                            |                                                                |                         |
| 15.2                                                                                                            | Audio or video recordings and transcripts of post earnings/quarterly calls                                                                                                             | NA                            |                                                                |                         |
| 16                                                                                                              | New name and the old name of the listed entity                                                                                                                                         | NA                            |                                                                |                         |
| 17                                                                                                              | Advertisements as per regulation 47 (1)                                                                                                                                                | Yes                           |                                                                | https://abhproperty.in/ |
| 18                                                                                                              | Credit rating or revision in credit rating obtained                                                                                                                                    | NA                            |                                                                |                         |
| 19                                                                                                              | Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year                                                                  | Yes                           |                                                                | https://abhproperty.in/ |
| 20                                                                                                              | Secretarial Compliance Report                                                                                                                                                          | Yes                           |                                                                | https://abhproperty.in/ |
| 21                                                                                                              | Materiality Policy as per Regulation 30 (4)                                                                                                                                            | Yes                           |                                                                | https://abhproperty.in/ |
| 22                                                                                                              | Disclosure of contact details of KMP who are authorized for the purpose of determining materiality as required under regulation 30(5)                                                  | Yes                           |                                                                | https://abhproperty.in/ |
| 23                                                                                                              | Disclosures under regulation 30(8)                                                                                                                                                     | Yes                           |                                                                | https://abhproperty.in/ |
| 24                                                                                                              | Statements of deviation(s) or variations(s) as specified in regulation 32                                                                                                              | Yes                           |                                                                | https://abhproperty.in/ |
| 25                                                                                                              | Dividend Distribution policy as per Regulation 43A(1)                                                                                                                                  | Yes                           |                                                                | https://abhproperty.in/ |
| 26                                                                                                              | Annual return as provided under section 92 of the Companies Act, 2013                                                                                                                  | Yes                           |                                                                | https://abhproperty.in/ |
| 27                                                                                                              | Confirmation that the above disclosures are in a separate section as specified in regulation 46(2)                                                                                     | Yes                           |                                                                | https://abhproperty.in/ |
| 28                                                                                                              | Compliance with regulation 46(3) with respect to accuracy of disclosures on the website and timely updating                                                                            | Yes                           |                                                                | https://abhproperty.in/ |
| 29                                                                                                              | Disclosure of notes on website in terms of Listing Regulations explanatory [Text Block]                                                                                                |                               | Add Notes                                                      |                         |



| II. Annual Affirmations              |                                                                                                                                              |                                         |                               | Annexure I                                                     |  |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|-------------------------------|----------------------------------------------------------------|--|
| Sr                                   | Particulars                                                                                                                                  | Regulation Number                       | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. |  |
| 1                                    | Independent director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility'                            | 16(1)(b) & 25(6)                        | Yes                           |                                                                |  |
| 2                                    | Board composition                                                                                                                            | 17(1), 17(1A) & 17(1C), 17(1D) & 17(1E) | Yes                           |                                                                |  |
| 3                                    | Meeting of Board of directors                                                                                                                | 17(2)                                   | Yes                           |                                                                |  |
| 4                                    | Quorum of Board meeting                                                                                                                      | 17(2A)                                  | Yes                           |                                                                |  |
| 5                                    | Review of Compliance Reports                                                                                                                 | 17(3)                                   | Yes                           |                                                                |  |
| 6                                    | Plans for orderly succession for appointments                                                                                                | 17(4)                                   | Yes                           |                                                                |  |
| 7                                    | Code of Conduct                                                                                                                              | 17(5)                                   | Yes                           |                                                                |  |
| 8                                    | Fees/compensation                                                                                                                            | 17(6)                                   | Yes                           |                                                                |  |
| 9                                    | Minimum Information                                                                                                                          | 17(7)                                   | Yes                           |                                                                |  |
| 10                                   | Compliance Certificate                                                                                                                       | 17(8)                                   | Yes                           |                                                                |  |
| 11                                   | Risk Assessment & Management                                                                                                                 | 17(9)                                   | Yes                           |                                                                |  |
| 12                                   | Performance Evaluation of Independent Directors                                                                                              | 17(10)                                  | Yes                           |                                                                |  |
| 13                                   | Recommendation of Board                                                                                                                      | 17(11)                                  | Yes                           |                                                                |  |
| 14                                   | Maximum number of Directorships                                                                                                              | 17A                                     | Yes                           |                                                                |  |
| 15                                   | Composition of Audit Committee                                                                                                               | 18(1)                                   | Yes                           |                                                                |  |
| 16                                   | Meeting of Audit Committee                                                                                                                   | 18(2)                                   | Yes                           |                                                                |  |
| 17                                   | Role of Audit Committee and information to be reviewed by the audit committee                                                                | 18(3)                                   | Yes                           |                                                                |  |
| 18                                   | Composition of nomination & remuneration committee                                                                                           | 19(1) & (2)                             | Yes                           |                                                                |  |
| 19                                   | Quorum of Nomination and Remuneration Committee meeting                                                                                      | 19(2A)                                  | Yes                           |                                                                |  |
| 20                                   | Meeting of Nomination and Remuneration Committee                                                                                             | 19(3A)                                  | Yes                           |                                                                |  |
| 21                                   | Role of Nomination and Remuneration Committee                                                                                                | 19(4)                                   | Yes                           |                                                                |  |
| 22                                   | Composition of Stakeholder Relationship Committee                                                                                            | 20(1), 20(2) & 20(2A)                   | Yes                           |                                                                |  |
| 23                                   | Meeting of Stakeholders Relationship Committee                                                                                               | 20(3A)                                  | Yes                           |                                                                |  |
| 24                                   | Role of Stakeholders Relationship Committee                                                                                                  | 20(4)                                   | Yes                           |                                                                |  |
| 25                                   | Composition and role of risk management committee                                                                                            | 21(1),(2),(3),(4)                       | NA                            |                                                                |  |
| 26                                   | Meeting of Risk Management Committee                                                                                                         | 21(3A)                                  | NA                            |                                                                |  |
| 27                                   | Quorum of Risk Management Committee meeting                                                                                                  | 21(3B)                                  | NA                            |                                                                |  |
| 28                                   | Gap between the meetings of the Risk Management Committee                                                                                    | 21(3C)                                  | NA                            |                                                                |  |
| 29                                   | Vigil Mechanism                                                                                                                              | 22                                      | Yes                           |                                                                |  |
| 30                                   | Policy for related party Transaction                                                                                                         | 23(1), (1A), (5), (6), & (8)            | Yes                           |                                                                |  |
| 31                                   | Prior or Omnibus approval of Audit Committee for all related party transactions                                                              | 23(2), (3)                              | Yes                           |                                                                |  |
| 32                                   | Approval for material related party transactions                                                                                             | 23(4)                                   | Yes                           |                                                                |  |
| 33                                   | Disclosure of related party transactions on consolidated basis                                                                               | 23(9)                                   | Yes                           |                                                                |  |
| 34                                   | Composition of Board of Directors of unlisted material Subsidiary                                                                            | 24(1)                                   | Yes                           |                                                                |  |
| 35                                   | Other Corporate Governance requirements with respect to subsidiary of listed entity                                                          | 24(2),(3),(4),(5) & (6)                 | Yes                           |                                                                |  |
| 36                                   | Alternate Director to Independent Director                                                                                                   | 25(1)                                   | NA                            |                                                                |  |
| 37                                   | Maximum Tenure                                                                                                                               | 25(2)                                   | NA                            |                                                                |  |
| 38                                   | Appointment, Re-appointment or removal of an Independent Director through special resolution or the alternate mechanism                      | 25(2A)                                  | NA                            |                                                                |  |
| 39                                   | Meeting of independent directors                                                                                                             | 25(3) & (4)                             | Yes                           |                                                                |  |
| 40                                   | Familiarization of independent directors                                                                                                     | 25(7)                                   | Yes                           |                                                                |  |
| 41                                   | Declaration from Independent Director                                                                                                        | 25(8) & (9)                             | Yes                           |                                                                |  |
| 42                                   | Directors and Officers Insurance                                                                                                             | 25(10)                                  | NA                            |                                                                |  |
| 43                                   | Confirmation with respect to appointment of Independent Directors who resigned from the listed entity                                        | 25(11)                                  | Yes                           |                                                                |  |
| 44                                   | Memberships in Committees                                                                                                                    | 26(1)                                   | Yes                           |                                                                |  |
| 45                                   | Affirmation with compliance to code of conduct from members of Board of Directors and senior management personnel                            | 26(3)                                   | Yes                           |                                                                |  |
| 46                                   | Disclosure of Shareholding by Non-Executive Directors                                                                                        | 26(4)                                   | Yes                           |                                                                |  |
| 47                                   | Policy with respect to Obligations of directors and senior management                                                                        | 26(2) & 26(5)                           | Yes                           |                                                                |  |
| 48                                   | Approval of the Board and shareholders for compensation or profit sharing in connection with dealings in the securities of the listed entity | 26(6)                                   | Yes                           |                                                                |  |
| 49                                   | Vacancies in respect Key Managerial Personnel                                                                                                | 26A(1) & 26A(2)                         | Yes                           |                                                                |  |
| Any other information to be provided |                                                                                                                                              |                                         |                               | Add Notes                                                      |  |

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Prev



## Annexure II

|   |                   |                  |
|---|-------------------|------------------|
| 1 | Name of signatory | Aditya Agarwalla |
| 2 | Designation       | Director         |

## Compliance Report on Corporate Governance

1. Name of Listed Entity: Abha Property Project Limited
2. Quarter ending: 31st March, 2025

### I. Composition of Board of Directors

| Title<br>(Mr./<br>Ms.) | Name of the Director | PAN & DIN                           | Category<br>(Chairperson/Exec<br>utive/Non-<br>Executive<br>/Independent/No<br>minee) | Initial Date of<br>Appointment | Date of Re-<br>appointment | Date of Cessation | Tenure (in<br>Months) | Date of Birth | Whether special<br>resolution<br>Passed?<br>[Refer Reg.<br>17(1A) of Listing<br>Regulations] | Date of passing<br>special<br>resolution | No. Of<br>directorship in<br>listed entities<br>including this<br>listed entity<br>[in reference to<br>Regulation<br>17A(1)] | No of<br>Independent<br>Directorship in<br>listed entities<br>including this<br>listed entity<br>[in reference to<br>proviso to<br>regulation<br>17A(1)] | Number of<br>memberships in<br>Audit/<br>Stakeholder<br>Committee(s)<br>including this<br>listed entity<br>(Refer Regulation<br>26(1) of Listing<br>Regulations) | No. of post of<br>Chairperson in<br>Audit/Stakeholder<br>Committee held in<br>listed entities<br>including this<br>listed entity<br>(Refer Regulation<br>26(1) of Listing<br>Regulations) |
|------------------------|----------------------|-------------------------------------|---------------------------------------------------------------------------------------|--------------------------------|----------------------------|-------------------|-----------------------|---------------|----------------------------------------------------------------------------------------------|------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mr.                    | Vishal Agarwalla     | PAN:ACMPA9306<br>M DIN: 00129040    | Non-Executive                                                                         | 14-04-2003                     | -                          | -                 | 262                   | 16-09-1971    | N/A                                                                                          | -                                        | 1                                                                                                                            | 0                                                                                                                                                        | 1                                                                                                                                                                | 1                                                                                                                                                                                         |
| Mr.                    | Amit Agarwalla       | PAN:ACMPA9303<br>Q DIN: 00338081    | Executive                                                                             | 14-08-2017                     | 01-06-2024                 | -                 | 90                    | 27-08-1971    | N/A                                                                                          | -                                        | 1                                                                                                                            | 0                                                                                                                                                        | 1                                                                                                                                                                | 0                                                                                                                                                                                         |
| Mr.                    | Sumit Agarwalla      | PAN: ACMPA9292J<br>DIN: 00336064    | Non-Executive                                                                         | 14-07-2003                     | -                          | -                 | 259                   | 06-12-1972    | N/A                                                                                          | -                                        | 1                                                                                                                            | 0                                                                                                                                                        | 0                                                                                                                                                                | 0                                                                                                                                                                                         |
| Mr.                    | Aditya Agarwalla     | PAN:<br>ACMPA9304K DIN:<br>00140683 | Executive                                                                             | 14-08-2017                     | -                          | -                 | 90                    | 28-12-1974    | N/A                                                                                          | -                                        | 1                                                                                                                            | 0                                                                                                                                                        | 1                                                                                                                                                                | 0                                                                                                                                                                                         |
| Ms.                    | Mandeep Kaur Jaiswal | PAN:<br>BWHPK8912P<br>DIN: 10077160 | Non-Executive-<br>Independent                                                         | 29-05-2023                     | -                          | -                 | 23                    | 26-05-1990    | N/A                                                                                          | -                                        | 4                                                                                                                            | 4                                                                                                                                                        | 2                                                                                                                                                                | 1                                                                                                                                                                                         |
| Ms.                    | Ayushi Khaitan       | PAN:<br>GHGPK4103M<br>DIN: 10171829 | Non-Executive-<br>Independent                                                         | 29-05-2023                     | -                          | -                 | 23                    | 06-09-1993    | N/A                                                                                          | -                                        | 2                                                                                                                            | 2                                                                                                                                                        | 2                                                                                                                                                                | 0                                                                                                                                                                                         |

Whether Regular chairperson appointed : No

Whether Chairperson is related to managing director or CEO : No

Notes:



## II. Composition of Committees

| Name of Committee                            | Whether Regular chairperson appointed | Name of Committee Members                                                     | Category (Chairperson/ Executive/ Non-Executive/ Independent/ Nominee)                               | Date of Appointment                                  | Date of Cessation |
|----------------------------------------------|---------------------------------------|-------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|------------------------------------------------------|-------------------|
| 1. Audit Committee                           | Yes                                   | Mandeep Kaur Jaiswal<br>Ayushi Khaitan<br>Aditya Agarwalla                    | Chairperson-Non-Executive-Independent<br>Non-Executive-Independent<br>Executive                      | 29-05-2023<br>29-05-2023<br>14-08-2017               | -<br>-<br>-       |
| 2. Nomination & Remuneration Committee       | Yes                                   | Mandeep Kaur Jaiswal<br>Ayushi Khaitan<br>Sumit Agarwalla<br>Vishal Agarwalla | Chairperson-Non-Executive-Independent<br>Non-Executive-Independent<br>Non-Executive<br>Non-Executive | 29-05-2023<br>29-05-2023<br>31-03-2015<br>31-03-2015 | -<br>-<br>-<br>-  |
| 3. Risk Management Committee                 | NA                                    |                                                                               | Not Applicable                                                                                       |                                                      |                   |
| 4. Stakeholders Relationship Committee       | Yes                                   | Vishal Agarwalla<br>Amit Agarwalla                                            | Chairman-Non-Executive<br>Executive                                                                  | 29-06-2021<br>29-06-2021                             | -<br>-            |
| 5. Corporate Social Responsibility Committee | NA                                    | Mandeep Kaur Jaiswal                                                          | Non-Executive-Independent                                                                            | 29-05-2023                                           | -                 |

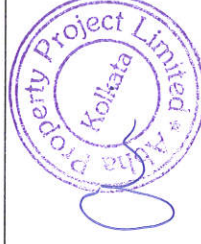
## III. Meeting of Board of Directors

| Date(s) of Meeting (if any) in the previous quarter | Date(s) of Meeting (if any) in the relevant quarter | Whether requirement of Quorum met | Number of Directors present | Number of independent directors present | Maximum gap between any two consecutive meetings (in number of days) |
|-----------------------------------------------------|-----------------------------------------------------|-----------------------------------|-----------------------------|-----------------------------------------|----------------------------------------------------------------------|
| 12-11-2024                                          | 13-02-2025                                          | Yes                               | 6                           | 2                                       | 92                                                                   |
| 12-11-2024                                          | 04-03-2025                                          | Yes                               | 6                           | 2                                       | 111                                                                  |
| 21-12-2024                                          | 13-02-2025                                          | Yes                               | 6                           | 2                                       | 53                                                                   |
| 21-12-2024                                          | 04-03-2025                                          | Yes                               | 6                           | 2                                       | 72                                                                   |

## IV. Meeting of Committees

| Date(s) of meeting of the committee in the relevant quarter | Whether requirement of Quorum met (details) <sup>1)</sup> | Number of Directors present | Number of independent directors present | Date(s) of meeting of the committee in the previous quarter | Maximum gap between any two consecutive meetings in number of days |
|-------------------------------------------------------------|-----------------------------------------------------------|-----------------------------|-----------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------|
| Audit Committee                                             |                                                           |                             |                                         |                                                             |                                                                    |
| 13-02-2025                                                  | Yes                                                       | 3                           | 2                                       | 12-11-2024                                                  | 92                                                                 |
| 13-02-2025                                                  | Yes                                                       | 3                           | 2                                       | 21-12-2024                                                  | 53                                                                 |
| Stakeholders Relationship Committee                         |                                                           |                             |                                         |                                                             |                                                                    |
| -                                                           | Yes                                                       | -                           | -                                       | -                                                           | NA                                                                 |
| Nomination and Remuneration Committee                       |                                                           |                             |                                         |                                                             |                                                                    |
| -                                                           | Yes                                                       | -                           | -                                       | -                                                           | NA                                                                 |
| Corporate Social Responsibility Committee                   |                                                           |                             |                                         |                                                             |                                                                    |
| -                                                           | NA                                                        |                             |                                         |                                                             | NA                                                                 |
| Risk Management Committee                                   |                                                           |                             |                                         |                                                             |                                                                    |
| -                                                           | NA                                                        |                             |                                         |                                                             | NA                                                                 |

Note: In pursuance of the Board of Directors meeting held on 29th May, 2023, a rights issue committee of the Board comprises with 3 members out of which 2 Executive Directors & 1 Company Secretary (KMP) were formed to look after the routine responsibilities w.r.t. the proposed rights issue of the equity shares by the Company. This is an non-statutory committee.



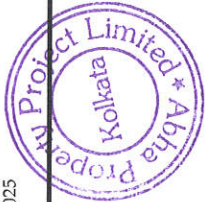
| V. Related Party Transactions                                                                          | Subject | Compliance status (Yes/No/NA) |
|--------------------------------------------------------------------------------------------------------|---------|-------------------------------|
| Whether prior approval of audit committee obtained                                                     |         | Yes                           |
| Whether shareholder approval obtained for material RPT                                                 |         | Yes                           |
| Whether details of RPT entered into pursuant to omnibus approval have been reviewed by Audit Committee |         | Yes                           |

**VI. Affirmations**

- The composition of Board of Directors is in terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
- The composition of the following Committees is in terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
  - Audit Committee
  - Nomination & Remuneration Committee
  - Stakeholders Relationship Committee
  - Risk Management Committee (Not applicable)
  - Corporate Social Responsibility Committee (Not applicable)
- The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- The meetings of the Board of Directors and the above Committees have been conducted in the manner as specified in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- The report submitted for the quarter ended 31.12.2024 has been placed before Board of Directors in its meeting held on 13th February, 2025.
- This report will be placed before the Board of Directors in the upcoming Board Meeting.

For Abha Property Project Limited

*Aditya Agarwalla*  
 Aditya Agarwalla  
 Director & Chief Financial Officer  
 DIN: 00140683  
 Date: 15th April, 2025  
 Place: Kolkata



ANNEXURE II

Compliance Report on Corporate Governance at the end of Six months ended 31st March, 2025.

| I Affirmations                                                                                                                                                                 | Regulation Number                    | Compliance Status (Yes/No/NA) |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|-------------------------------|
| <b>Broad Heading</b>                                                                                                                                                           |                                      |                               |
| Copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report, business responsibility report displayed on website | 46(2)                                | Yes                           |
| Presence of Chairperson of Audit Committee at the Annual General Meeting                                                                                                       | 18(1)(d)                             | Yes                           |
| Presence of Chairperson of the Nomination and Remuneration Committee at the Annual General Meeting                                                                             | 19(3)                                | Yes                           |
| Presence of Chairperson of the Stakeholder Relationship Committee at the Annual General Meeting                                                                                | 20(3)                                | Yes                           |
| Whether "Corporate Governance Report" disclosed in Annual Report                                                                                                               | 34(3) read with para C of Schedule V | Yes                           |

For Abha Property Project Limited

*Aditya Agarwalla*  
Aditya Agarwalla  
Director & Chief Financial Officer

DIN: 00140683

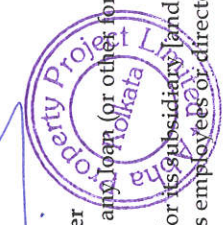
Date: 15th April, 2025

Place: Kolkata



## Compliance Report on Corporate Governance on half year basis i.e. for the second half of the FY 2024-25.

Half year ending - 31st March, 2025.

| I. Disclosure of Loans / guarantees / comfort letters / securities etc. (refer note below)                                                                                                                                                                                                                                                                                                                                  |                                                                           |                                                        |                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|--------------------------------------------------------|-----------------------------------------------------------------------------------|
| Entity                                                                                                                                                                                                                                                                                                                                                                                                                      | Aggregate amount advanced by the listed entity directly or indirectly to: | Aggregate amount advanced during six months            | Balance outstanding at the end of six months                                      |
| Promoter or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                             |                                                                           | Nil                                                    | Nil                                                                               |
| Promoter Group or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                       |                                                                           | Nil                                                    | Nil                                                                               |
| Directors (including relatives) or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                      |                                                                           | Nil                                                    | Nil                                                                               |
| KMPs or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                                 |                                                                           | Nil                                                    | Nil                                                                               |
| (B) Any guarantee/ comfort letter (by whatever name called) provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:                                                                                                                                                                                                                                      |                                                                           |                                                        |                                                                                   |
| Entity                                                                                                                                                                                                                                                                                                                                                                                                                      | Type (guarantee, comfort letter etc.)                                     | Aggregate amount of issuance during six months         | Balance outstanding at the end of six months (taking into account any invocation) |
| Promoter or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                             | Nil                                                                       | Nil                                                    | Nil                                                                               |
| Promoter Group or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                       | Nil                                                                       | Nil                                                    | Nil                                                                               |
| Directors (including relatives) or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                      | Nil                                                                       | Nil                                                    | Nil                                                                               |
| KMPs or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                                 | Nil                                                                       | Nil                                                    | Nil                                                                               |
| (C) Any security provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:                                                                                                                                                                                                                                                                                 |                                                                           |                                                        |                                                                                   |
| Entity                                                                                                                                                                                                                                                                                                                                                                                                                      | Type of security (cash, shares etc.)                                      | Aggregate value of security provided during six months | Balance outstanding at the end of six months                                      |
| Promoter or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                             | Nil                                                                       | Nil                                                    | Nil                                                                               |
| Promoter Group or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                       | Nil                                                                       | Nil                                                    | Nil                                                                               |
| Directors (including relatives) or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                      | Nil                                                                       | Nil                                                    | Nil                                                                               |
| KMPs or any other entity controlled by them                                                                                                                                                                                                                                                                                                                                                                                 | Nil                                                                       | Nil                                                    | Nil                                                                               |
| II. Affirmations:                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                           |                                                        |                                                                                   |
| All loans (or other form of debt), guarantees, comfort letters (by whatever name called) or securities in connection with any loan(s) (or other form of debt) given directly or indirectly by the listed entity to promoter(s), promoter group, director(s) (including their relatives), key managerial personnel (including their relatives) or any entity controlled by them are in the economic interest of the company. |                                                                           |                                                        |                                                                                   |
| For Abha Property Project Limited                                                                                                                                                                                                                                                                                                                                                                                           |                                                                           |                                                        |                                                                                   |
| <br>Aditya Agarwalla<br>Director & Chief Financial Officer                                                                                                                                                                                                                                                                             |                                                                           |                                                        |                                                                                   |
|                                                                                                                                                                                                                                                                                                                                        |                                                                           |                                                        |                                                                                   |
| Note:: These disclosures excludes any loan (or other form of debt), guarantee / comfort letter (by whatever name called) or security provided in connection with any loan or any other form of debt:                                                                                                                                                                                                                        |                                                                           |                                                        |                                                                                   |
| a) by the Company to /for its subsidiary [and joint-venture company] whose accounts are consolidated with the Company.<br>b) by the Company to its employees or directors as a part of the service conditions.                                                                                                                                                                                                              |                                                                           |                                                        |                                                                                   |

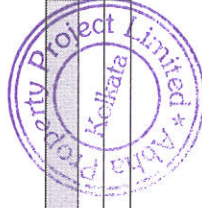
| Annexure IV                                                                                                     |                                                                                                                                                                                        |                               |                                                                |                          |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|----------------------------------------------------------------|--------------------------|
| Annexure IV to be submitted by listed entity at the end of the financial year (for the whole of financial year) |                                                                                                                                                                                        |                               |                                                                |                          |
| I. Disclosure on website in terms of Listing Regulations                                                        |                                                                                                                                                                                        |                               |                                                                |                          |
| Sr                                                                                                              | Item                                                                                                                                                                                   | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. | Web address              |
| 1                                                                                                               | Details of business                                                                                                                                                                    | Yes                           |                                                                | https://abhaproperty.in/ |
| 2                                                                                                               | Terms and conditions of appointment of independent directors                                                                                                                           | Yes                           |                                                                | https://abhaproperty.in/ |
| 3                                                                                                               | Composition of various committees of board of directors                                                                                                                                | Yes                           |                                                                | https://abhaproperty.in/ |
| 4                                                                                                               | Code of conduct of board of directors and senior management personnel                                                                                                                  | Yes                           |                                                                | https://abhaproperty.in/ |
| 5                                                                                                               | Details of establishment of vigil mechanism/ Whistle Blower policy                                                                                                                     | Yes                           |                                                                | https://abhaproperty.in/ |
| 6                                                                                                               | Criteria of making payments to non-executive directors                                                                                                                                 | Yes                           |                                                                | https://abhaproperty.in/ |
| 7                                                                                                               | Policy on dealing with related party transactions                                                                                                                                      | Yes                           |                                                                | https://abhaproperty.in/ |
| 8                                                                                                               | Policy for determining 'material' subsidiaries                                                                                                                                         | Yes                           |                                                                | https://abhaproperty.in/ |
| 9                                                                                                               | Details of familiarization programmes imparted to independent directors                                                                                                                | Yes                           |                                                                | https://abhaproperty.in/ |
| 10                                                                                                              | Email address for grievance redressal and other relevant details                                                                                                                       | Yes                           |                                                                | https://abhaproperty.in/ |
| 11                                                                                                              | Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances                                                | Yes                           |                                                                | https://abhaproperty.in/ |
| 12                                                                                                              | Financial results                                                                                                                                                                      | Yes                           |                                                                | https://abhaproperty.in/ |
| 13                                                                                                              | Shareholding pattern                                                                                                                                                                   | Yes                           |                                                                | https://abhaproperty.in/ |
| 14                                                                                                              | Details of agreements entered into with the media companies and/or their associates                                                                                                    | NA                            |                                                                |                          |
| 15.1                                                                                                            | Schedule of analyst or institutional investor meet and presentations made by the listed entity to analysts or institutional investors simultaneously with submission to stock exchange | NA                            |                                                                |                          |
| 15.2                                                                                                            | Audio or video recordings and transcripts of post earnings/quarterly calls                                                                                                             | NA                            |                                                                |                          |
| 16                                                                                                              | New name and the old name of the listed entity                                                                                                                                         | NA                            |                                                                |                          |
| 17                                                                                                              | Advertisements as per regulation 47 (1)                                                                                                                                                | Yes                           |                                                                | https://abhaproperty.in/ |
| 18                                                                                                              | Credit rating or revision in credit rating obtained                                                                                                                                    | NA                            |                                                                |                          |
| 19                                                                                                              | Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year                                                                  | Yes                           |                                                                | https://abhaproperty.in/ |
| 20                                                                                                              | Secretarial Compliance Report                                                                                                                                                          | Yes                           |                                                                | https://abhaproperty.in/ |
| 21                                                                                                              | Materiality Policy as per Regulation 30 (4)                                                                                                                                            | Yes                           |                                                                | https://abhaproperty.in/ |
| 22                                                                                                              | Disclosure of contact details of KMP who are authorized for the purpose of determining materiality as required under regulation 30(5)                                                  | Yes                           |                                                                | https://abhaproperty.in/ |
| 23                                                                                                              | Disclosures under regulation 30(8)                                                                                                                                                     | Yes                           |                                                                | https://abhaproperty.in/ |
| 24                                                                                                              | Statements of deviation(s) or variations(s) as specified in regulation 32                                                                                                              | Yes                           |                                                                | https://abhaproperty.in/ |
| 25                                                                                                              | Dividend Distribution policy as per Regulation 43A(1)                                                                                                                                  | Yes                           |                                                                | https://abhaproperty.in/ |
| 26                                                                                                              | Annual return as provided under section 92 of the Companies Act, 2013                                                                                                                  | Yes                           |                                                                | https://abhaproperty.in/ |
| 27                                                                                                              | Confirmation that the above disclosures are in a separate section as specified in regulation 46(2)                                                                                     | Yes                           |                                                                | https://abhaproperty.in/ |
| 28                                                                                                              | Compliance with regulation 46(3) with respect to accuracy of disclosures on the website and timely updating                                                                            | Yes                           |                                                                | https://abhaproperty.in/ |
| 29                                                                                                              | Disclosure of notes on website in terms of Listing Regulations explanatory [Text Block]                                                                                                |                               | Add Notes                                                      |                          |



| II. Annual Affirmations              |                                                                                                                                              |                                         |                               | Annexure I                                                     |  |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|-------------------------------|----------------------------------------------------------------|--|
| Sr                                   | Particulars                                                                                                                                  | Regulation Number                       | Compliance status (Yes/No/NA) | If status is "No" details of non-compliance may be given here. |  |
| 1                                    | Independent director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility'                            | 16(1)(b) & 25(6)                        | Yes                           |                                                                |  |
| 2                                    | Board composition                                                                                                                            | 17(1), 17(1A) & 17(1C), 17(1D) & 17(1E) | Yes                           |                                                                |  |
| 3                                    | Meeting of Board of directors                                                                                                                | 17(2)                                   | Yes                           |                                                                |  |
| 4                                    | Quorum of Board meeting                                                                                                                      | 17(2A)                                  | Yes                           |                                                                |  |
| 5                                    | Review of Compliance Reports                                                                                                                 | 17(3)                                   | Yes                           |                                                                |  |
| 6                                    | Plans for orderly succession for appointments                                                                                                | 17(4)                                   | Yes                           |                                                                |  |
| 7                                    | Code of Conduct                                                                                                                              | 17(5)                                   | Yes                           |                                                                |  |
| 8                                    | Fees/compensation                                                                                                                            | 17(6)                                   | Yes                           |                                                                |  |
| 9                                    | Minimum Information                                                                                                                          | 17(7)                                   | Yes                           |                                                                |  |
| 10                                   | Compliance Certificate                                                                                                                       | 17(8)                                   | Yes                           |                                                                |  |
| 11                                   | Risk Assessment & Management                                                                                                                 | 17(9)                                   | Yes                           |                                                                |  |
| 12                                   | Performance Evaluation of Independent Directors                                                                                              | 17(10)                                  | Yes                           |                                                                |  |
| 13                                   | Recommendation of Board                                                                                                                      | 17(11)                                  | Yes                           |                                                                |  |
| 14                                   | Maximum number of Directorships                                                                                                              | 17A                                     | Yes                           |                                                                |  |
| 15                                   | Composition of Audit Committee                                                                                                               | 18(1)                                   | Yes                           |                                                                |  |
| 16                                   | Meeting of Audit Committee                                                                                                                   | 18(2)                                   | Yes                           |                                                                |  |
| 17                                   | Role of Audit Committee and information to be reviewed by the audit committee                                                                | 18(3)                                   | Yes                           |                                                                |  |
| 18                                   | Composition of nomination & remuneration committee                                                                                           | 19(1) & (2)                             | Yes                           |                                                                |  |
| 19                                   | Quorum of Nomination and Remuneration Committee meeting                                                                                      | 19(2A)                                  | Yes                           |                                                                |  |
| 20                                   | Meeting of Nomination and Remuneration Committee                                                                                             | 19(3A)                                  | Yes                           |                                                                |  |
| 21                                   | Role of Nomination and Remuneration Committee                                                                                                | 19(4)                                   | Yes                           |                                                                |  |
| 22                                   | Composition of Stakeholder Relationship Committee                                                                                            | 20(1), 20(2) & 20(2A)                   | Yes                           |                                                                |  |
| 23                                   | Meeting of Stakeholders Relationship Committee                                                                                               | 20(3A)                                  | Yes                           |                                                                |  |
| 24                                   | Role of Stakeholders Relationship Committee                                                                                                  | 20(4)                                   | Yes                           |                                                                |  |
| 25                                   | Composition and role of risk management committee                                                                                            | 21(1),(2),(3),(4)                       | NA                            |                                                                |  |
| 26                                   | Meeting of Risk Management Committee                                                                                                         | 21(3A)                                  | NA                            |                                                                |  |
| 27                                   | Quorum of Risk Management Committee meeting                                                                                                  | 21(3B)                                  | NA                            |                                                                |  |
| 28                                   | Gap between the meetings of the Risk Management Committee                                                                                    | 21(3C)                                  | NA                            |                                                                |  |
| 29                                   | Vigil Mechanism                                                                                                                              | 22                                      | Yes                           |                                                                |  |
| 30                                   | Policy for related party Transaction                                                                                                         | 23(1), (1A), (5), (6), & (8)            | Yes                           |                                                                |  |
| 31                                   | Prior or Omnibus approval of Audit Committee for all related party transactions                                                              | 23(2), (3)                              | Yes                           |                                                                |  |
| 32                                   | Approval for material related party transactions                                                                                             | 23(4)                                   | Yes                           |                                                                |  |
| 33                                   | Disclosure of related party transactions on consolidated basis                                                                               | 23(9)                                   | Yes                           |                                                                |  |
| 34                                   | Composition of Board of Directors of unlisted material Subsidiary                                                                            | 24(1)                                   | Yes                           |                                                                |  |
| 35                                   | Other Corporate Governance requirements with respect to subsidiary of listed entity                                                          | 24(2),(3),(4),(5) & (6)                 | Yes                           |                                                                |  |
| 36                                   | Alternate Director to Independent Director                                                                                                   | 25(1)                                   | NA                            |                                                                |  |
| 37                                   | Maximum Tenure                                                                                                                               | 25(2)                                   | NA                            |                                                                |  |
| 38                                   | Appointment, Re-appointment or removal of an Independent Director through special resolution or the alternate mechanism                      | 25(2A)                                  | NA                            |                                                                |  |
| 39                                   | Meeting of independent directors                                                                                                             | 25(3) & (4)                             | Yes                           |                                                                |  |
| 40                                   | Familiarization of independent directors                                                                                                     | 25(7)                                   | Yes                           |                                                                |  |
| 41                                   | Declaration from Independent Director                                                                                                        | 25(8) & (9)                             | Yes                           |                                                                |  |
| 42                                   | Directors and Officers Insurance                                                                                                             | 25(10)                                  | NA                            |                                                                |  |
| 43                                   | Confirmation with respect to appointment of Independent Directors who resigned from the listed entity                                        | 25(11)                                  | Yes                           |                                                                |  |
| 44                                   | Memberships in Committees                                                                                                                    | 26(1)                                   | Yes                           |                                                                |  |
| 45                                   | Affirmation with compliance to code of conduct from members of Board of Directors and Senior management personnel                            | 26(3)                                   | Yes                           |                                                                |  |
| 46                                   | Disclosure of Shareholding by Non-Executive Directors                                                                                        | 26(4)                                   | Yes                           |                                                                |  |
| 47                                   | Policy with respect to Obligations of directors and senior management                                                                        | 26(2) & 26(5)                           | Yes                           |                                                                |  |
| 48                                   | Approval of the Board and shareholders for compensation or profit sharing in connection with dealings in the securities of the listed entity | 26(6)                                   | Yes                           |                                                                |  |
| 49                                   | Vacancies in respect Key Managerial Personnel                                                                                                | 26A(1) & 26A(2)                         | Yes                           |                                                                |  |
| Any other information to be provided |                                                                                                                                              |                                         |                               | Add Notes                                                      |  |

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Annexure II

|   |                   |                  |
|---|-------------------|------------------|
| 1 | Name of signatory | Aditya Agarwalla |
| 2 | Designation       | Director         |