

June 30, 2023

BSE Ltd.
Corporate Relationship Department,
1st Floor, New Trading Ring,
Rotunda Building, P J Towers,
Dalal Street, Fort, Mumbai – 400 001
corp.relations@bseindia.com

Name of the Company: Striton Properties Private Limited (“the Company”)

Security Code No.: 958871

ISIN: INE09BC08019

Sub.: Disclosure of reasons for delay in submission of financial results by the Company

Dear Sir(s)/Ma'am,

With reference to your letter dated May 29 2023 whereby the Exchange informed that the rated, listed, unsecured, redeemable, non-convertible debentures of face value of ₹1,00,000 (Indian Rupees One Lakh only) each aggregating ₹725,00,00,000 (Indian Rupees Seven Hundred and Twenty-Five Crore only), having ISIN INE09BC08019 ("**NCDs**") was transferred from Kairos Property Managers Private Limited ("KPMPL") to Striton Properties Private Limited ("the Company"/ "SPPL") pursuant to the Composite Scheme of Amalgamation and Arrangement ("**Scheme**") and the same is available for trading under SPPL with effect from Wednesday, May 31, 2023.

Pursuant to regulation 52 of the SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 ("**Listing Regulation**"), the Company is required to submit the Audited Financial Results for the quarter and financial year ended March 31, 2023 within 60 days from the close of the financial year i.e. by May 30, 2023.

Reference is also invited to the applications filed by the Company with the Securities and Exchange Board of India for delisting of the NCDs and extension of time to file the financial results and the following letters issued by the Securities and Exchange Board of India to the Company:

1. Letter dated June 12, 2023 bearing reference number SEBI/HO/DDHS/DDHS-POD1/P/OW/0000023000/22890/1 granting the approval and permission to delisting the NCDs (*as defined below*) (*Annexed as Annexure A hereto*).
2. Letter dated June 07, 2023 bearing reference number SEBI/HO/DDHS/P/OW/0000023000/1, granting an extension for 1 (one) month to the Company to submit its financial results (*Annexed as Annexure B hereto*)

Upon receipt of the delisting approval from the Securities and Exchange Board of India, the Company has written to BSE and awaits its response for process to be followed for delisting of the NCDs.

STRITON PROPERTIES PRIVATE LIMITED

Registered Office: 401 and 402, 4th floor, Delphi A, Orchard Avenue, Powai, Mumbai – 400 076.

T: 022-68457900 **E:** kairos.legal@brookfield.com **W:** www.waterstoneshotel.com **CIN:** U70109MH2021PTC365237

Brookfield Properties

The Company had filed Board meeting intimation pursuant to Regulation 50 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 on June 26, 2023. However, basis the present scenario, the Company has intimated the Securities and Exchange Board of India & BSE that there is delay in preparation of the financial results and the same shall be prepared and submitted by July 15, 2023.

You are requested to take the above information on record.

Thanking You.

Yours Faithfully,
For **STRITON PROPERTIES PRIVATE LIMITED**

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SUJANMAL SETHIA
Date: 2023.06.30 20:39:57
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(KANTILAL SUJANMAL SETHIA)
COMPANY SECRETARY
MEMBERSHIP NO-A6881

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भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

General Manager
Department of Debt and Hybrid Securities
Division – POD - I
Email: pradeepr@sebi.gov.in

SEBI/HO/DDHS/DDHS-POD1/P/OW/2023/22890/1

June 12, 2023

Mr Hubert Ignatius Pinto

Director,
Kairos Property Managers Private Limited,
Bethel Bungalow, Manickpur, Navpada, Vasai (West),
Near Bhavani Medical, Vasai,
Mumbai - 401202, Maharashtra.

Sub: Application seeking clarification regarding delisting of Non-Convertible Debt Securities (NCDs) pursuant to a scheme of arrangement (SOA) approved by NCLT vide order dated April 24, 2023

Sir,

1. This has reference to the applications made by Kairos Propert Managers Private Limited (KPMPL) and Striton Properties Private Limited (SPPL) dated March 21, 2023 and May 19, 2023 seeking clarification regarding delisting of NCDs from BSE pursuant to a scheme of arrangement (SOA) approved by NCLT vide order dated April 24, 2023 and in case delisting is not permitted under the extant regulations, request for extension of time for submission of annual audited standalone and consolidated financial statements for the Financial Year ending on March 31, 2023. The applicant submitted that there is only one debenture holder holding such NCDs and it has given its approval/ no-objection to alter the status of NCDs from listed to unlisted.
2. In this regard and having noted the above, it is informed that SEBI has no adverse comments on the scheme of arrangement. Further, the applicant is advised to inform the debenture holder in writing that delisting will take away certain rights that are available only in case of listed NCDs.

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अनुवर्ती :
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**Securities and Exchange
Board of India**

3. Since SEBI does not have any adverse comments on the same, the application seeking extension of time for submission of audited annual standalone and consolidated financial statements for the financial year ending on March 31, 2023 does not arise.

Yours sincerely,

Pradeep Ramakrishnan

CC. to:

Ms. Rupal Khandelwal
Assistant General Manager
Listing-Sales
Bombay stock Exchange
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-40001



भारतीय प्रतिभूति
और विनिमय बोर्ड
Securities and Exchange
Board of India

Assistant General Manager
Department of Debt and Hybrid Securities
Division - RAC-1
Email: divyah@sebi.gov.in
Phone: 022-26449293

SEBI/HO/DDHS/DDHS/P/OW/2023/0000023000/1
June 07, 2023

Shri Hubert Ignatius Pinto
Director,
Striton Properties Private Limited,
401 & 402, 4th Floor, Delphi A,
Orchard Avenue, Powai,
Mumbai, 400076

Sir,

Sub: Application seeking extension of time for submissions of financials under Regulations 52(2)(d) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

1. This has reference to the emails/ letters dated May 19, 2023 and May 30, 2023 from Striton Properties Private Limited (SPPL), seeking extension of timeline from compliance with the provisions of Regulation 52(2)(d) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (LODR Regulations).
2. Upon examination, it is informed that your request for exemption from compliance with the requirement to submit annual audited financial results for the year ended March 31, 2023, under the relevant provisions of the LODR Regulations, has been acceded to, and extension has been provided till June 30, 2023. SPPL shall submit the financial results and make relevant disclosures to the stock exchange(s) on or before June 30, 2023, for the year ended March 31, 2023, in terms of Regulation 52(2)(d) of the LODR Regulations.
3. It may be noted that the above exemption has been granted only for the specific provisions mentioned above and for the specified time period and it should not be taken as a precedent for any such future compliance requirements.
4. SPPL shall ensure compliance with all relevant Regulations and Circulars.

Yours sincerely,

Divya Hamirbasia
Divya Hamirbasia

Copy to:

BSE Limited
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