

Rustomjee®

Date: August 6, 2025

The Vice President
Listing Department,
National Stock Exchange of India Limited
"Exchange Planza",
Bandra Kurla Complex,
Bandra East, Mumbai – 400 051
Scrip Symbol: RUSTOMJEE

Dear Sir,

Sub: Submission w.r.t the Penalty imposed by the National Stock Exchanges of India Limited ("NSE")

This is in reference to your email dated June 27, 2025, serving a notice of non – compliance with the regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, ("SEBI LODR") stating delay in submission of Related Party Disclosures for the half year ended March 31, 2025, and levied total fine of Rs. 10,000/- for the late submission by two days.

In this regards, we would like to submit that Keystone Realtors Limited ("Company") is listed on BSE Limited ("BSE") and NSE and the Company had filed the disclosures of related party transactions which are a part of the Integrated Financials with BSE (designated stock exchange) on May 14, 2025, within the prescribed time frame, as per the Integrated Filing system notified vide SEBI circular SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated December 31, 2024.

Further, the Company had received an email dated May 15, 2025, stating that NSE had not received the above-referred filings. The Company was under the presumption that being an Integrated Filing system whereby Integrated Financials which includes the Related Party Disclosures would not have required filings for NSE separately (as the Company filed the same with BSE on May 14, 2025) under the Single Filing system. In order to adhere to the email received from NSE dated May 15, 2025, the Company filed the above-mentioned filings with NSE separately on May 16, 2025.

KEYSTONE REALTORS LIMITED



As per notice dated June 27, 2025, the matter shall be placed before the Board in the next Board meeting for discussion/ comments/ view and decision of the Board members and the same need to be submitted to the NSE.

This is to further inform you that the above matter was placed before the Board at their meeting held on August 5, 2025 and the Board members read the response submitted by the Company dated June 11, 2025 to NSE and the Board noted the same.

You are requested to take note of the same.

Thanking you,
For Keystone Realtors Limited

Bimal K Nanda
Company Secretary and Compliance Officer
ACS - 11578

KEYSTONE REALTORS LIMITED

Registered Office: 702, NATRAJ, M. V. Road Junction, Western Express Highway, Andheri (East), Mumbai - 400 069.
Tel.: +91 22 6676 6888 | CIN : L45200MH1995PLC094208 | Website: www.rustomjee.com



NSE/LIST-SOP/FINES/0710**June 27, 2025**

To,

The Company Secretary
Keystone Realtors Limited
702, Natraj, MV Road Junction,
Western Express Highway,
Andheri (East), Mumbai-400069

Dear Sir/Madam,

Subject: Notice for non-compliance with Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”)

Your attention is drawn towards SEBI Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 (hereinafter referred to as “Master Circular”), specifying Standard Operating Procedure for imposing fines and suspension of trading in case of non-compliance with the Listing Regulations. On verification of the Exchange records, it has been observed that your Company has not complied/delayed complied with Regulation 23(9) of Listing Regulation(s). The details of non-compliance(s)/delayed compliance(s), total fine payable by your Company and the particulars about manner in which fine should be remitted to the Exchange is enclosed as **Annexure**.

You are requested to inform the Promoters about identified non-compliance/delayed compliance and to ensure compliance with Regulation 23(9) of Listing regulation(s) and/or make the payment of fines within 15 days from the date of this notice, failing which the Exchange may initiate freezing of entire shareholding of the Promoters in the Company as well as in other securities held in the Demat account of the Promoters.

You may also file the waiver request. Below are the parameters for filing the application for waiver:

- a) Detailed submission indicating reasons for waiver, considering the extant Policy for Exemption of Fines, and shall indicate whether it intends to seek personal hearing before the concerned Committee.
- b) The Company may further note that ***compliance is a prerequisite for applying for waiver***. Thus, waiver application of the non-complied Companies will not be processed without achieving the compliance.
- c) In case the Company is non-complaint under multiple regulations, the Company is advised to file a single application mentioning the details of all the respective regulations and quarters for which the Company intends to apply for waiver, in order to avoid the duplication of the entries.
- d) Processing fees for an amount of **Rs.10,000 plus 18% GST** to be paid to the **designated Exchange**, (as segregated between the Exchanges as per the policy for waiver of fines) only if the fine amount is more than Rs. 5,000.

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Signer: RACHNA JHA
Date: Fri, Jun 27, 2025 21:24:29 IST
Location: NSE

National Stock Exchange Of India Limited

However, before filing an application for waiver of fines, you are requested to refer to the below policies available on the Exchange's website. For ready reference you may refer below links:

- i. **Policy on exemption of fine:**
https://archives.nseindia.com/content/equities/Policy_for_exemption_SOP_Equity.pdf
- ii. **Policy on processing of waiver application:**
https://nsearchives.nseindia.com/web/sites/default/files/inline-files/Policy_on_processing_of_waiver_application_segregation_of_commonly_listed_entities.pdf

The request for waiver of fine can be submitted to Exchange through NEAPS portal along with documentary evidence on the below link (Please note that waiver applications sent via mail will not be considered):

NEAPS>>Compliance>>Fine Waiver>>Waiver Request

Further, as per Master Circular, your Company is also required to ensure that the said non-compliance which has been identified by the Exchange and subsequent action taken by the Exchange in this regard shall be placed before the Board in the next Board Meeting and comments made by the Board shall be duly informed to the Exchange at the below mentioned path in NEAPS portal along with this letter for dissemination having the announcement text as 'Board comments on fine levied by the Exchange'.

Path: NEAPS > COMPLIANCE > Announcements > Announcements/ CA (Subject: Updates)

In case of any clarification, you may contact any of the below mentioned Exchange Officers from Listing Compliance Department:

- Ms. Harshita Chaubal
- Ms. Madhu Kadam
- Ms. Suman Lahoti
- Mr. Aniket Raut
- Ms. Chanchal Daga (Waiver request)
- Ms. Sweety Mamodia (Waiver request)
- Mr. Abhishek Sawant (Waiver request)

Yours faithfully
For **National Stock Exchange of India Limited**

Rachna Jha
Manager

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Signer: RACHNA JHA
Date: Fri, Jun 27, 2025 21:24:29 IST
Location: NSE

Annexure

Regulation	Half year ended	Fine amount per day (Rs.)	Days of non-compliance(s)	Fine amount (Rs.)
23(9)	31-Mar-2025	5000	2	10000
Total Fine				10000
GST (@18%)				1800
Total				11800*

* In case the Company is non-compliant as on the date of this letter then fine amount will keep on increasing every day till the date compliance is achieved.

Notes:

- **If the fine amount is paid before receipt of this letter, then inform the Exchange accordingly.**
- Please update the payment details on below mentioned path:
NEAPS > Payment > SOP Fine Payment.
- The above payment may be made vide RTGS / NEFT / Net Banking favouring 'National Stock Exchange of India Limited'. The bank details towards the payment of fine are as follows:

BENEFICIARY NAME	NATIONAL STOCK EXCHANGE OF INDIA LIMITED
BANK NAME	IDBI BANK LTD
A/C NO	Please refer Unique Account Code used for making Annual Listing fees to the Exchange
BRANCH	BANDRA KURLA COMPLEX, MUMBAI
RTGS/IFSC CODE	IBKL0001000

- The fine paid as above will be credited to IPFT as envisaged in the circular.

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