

# SHARMA AND TRIVEDI LLP

(Registered with Limited Liability)

Company Secretaries, LLPIN: AAW-6850; UIN: L2021MH011000  
C-316, 3<sup>rd</sup> Floor, Avior Corporate Park, Nirmal Galaxy, L.B.S. Marg,  
Mulund (West), Mumbai – 400 080  
Tel: (+91 22) 2591 3041, email id- csllp108@gmail.com

## Secretarial Compliance Report of Easy Trip Planners Limited for the year ended March 31, 2024

{Pursuant to Regulation 3(b) of the SEBI Circular No CIR / CFD/CMDI/ 27 / 2019 dated  
February 08, 2019 under SEBI (Listing Obligations & Disclosure Requirements)  
Regulations, 2015}

We, M/s. Sharma and Trivedi LLP, (LLPIN: AAW-6850), Company Secretaries, Mumbai, have examined:

- (a) all the documents and records made available to us and explanation provided by **Easy Trip Planners Limited** having CIN: L63090DL2008PLC179041 (the “**Company**” “**Listed entity**”);
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity (website address: <https://www.easemytrip.com/>); and
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this Report;

for the Financial Year ended March 31, 2024 (“**Review Period**”) in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (*Not Applicable*, as there was no instance during the year);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (*Not Applicable*, as there was no instance during the year);
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2008; (*Not Applicable*, as there was no instance during the year);

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(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(h) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder;

We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Additional Affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR) in terms of the BSE circular reference No. 20230316-14 and NSE Circular Ref. No. NSE/CML/ 2023/21 both dated 16<sup>th</sup> March, 2023:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<b>Secretarial Standards:</b>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	--
2.	<b>Adoption and timely updation of the Policies:</b>  • All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities  • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes  Yes	--
3.	<b>Maintenance and disclosures on Website:</b>  • The Listed entity is maintaining a functional website  • Timely dissemination of the documents/ information under a separate section on the website  • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website	Yes  Yes  Yes	--

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4.	<b>Disqualification of Director:</b> None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	--
5.	<b>To examine details related to Subsidiaries of listed entities:</b> (a) Identification of material Subsidiary Companies	NA	There is no such material subsidiary of the Company
	(b) Requirements with respect to disclosure of material as well as other Subsidiaries	Yes	--
6.	<b>Preservation of Documents:</b> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	--
7.	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	--
8.	<b>Related Party Transactions:</b> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions; or	Yes	--
	(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	N.A.	The Listed entity has obtained the prior approval of Audit Committee for all the Related Party Transactions
9.	<b>Disclosure of events or information:</b> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	--
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	--
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI	Yes	Please refer to details as mentioned in Para (a) below.

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	Regulations and circulars/ guidelines issued thereunder		
12.	<b>Additional Non-compliances, if any:</b> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	--

We hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of 2 matters specified below:-

S. No.		1
1.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	As per Regulation 43A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR Regulations”): The Top 1000 listed entities based on market capitalization (calculated as on March 31 of every financial year) shall formulate a dividend distribution policy which shall be disclosed on the website of the listed entity and a web-link shall also be provided in their annual reports.
2.	Regulation / Circular No.	Regulation 43A of LODR Regulations
3.	Deviations	The Company has not provided Dividend Distribution Policy Link in the Annual Report for the year ended 31 <sup>st</sup> March, 2023.
4.	Action Taken by	NSE and BSE
5.	Type of Action	Fine imposed by NSE and BSE
6.	Details of Violation	As stated in column 3 above
7.	Fine Amount	Rs.25,000/- (Rupees Twenty-Five Thousand only) plus applicable GST each to BSE & NSE.
8.	Observations/Remarks of the Practicing Company Secretary	The listed entity has assured that it will take due care in future.

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9.	Management Response	The Company has adopted all the required mandatory policies mentioned in the SEBI (LODR) Regulations, 2015 which are already uploaded on the company's website. Although no specific link was provided, however the company has repeatedly mentioned the weblink <a href="https://www.easemytrip.com/investor-relations.html">https://www.easemytrip.com/investor-relations.html</a> in the Annual Report which is also the general link for investor relations and specific link for all the policies through which policies can be navigated easily.
10.	Remarks	The listed entity has requested both NSE and BSE for waiver of fine.  These requests are under consideration of Stock Exchanges.
<b>S. No.</b>		<b>2</b>
1.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	As per Regulation 23(9) of SEBI (LODR) Regulations, 2015, the listed entity shall submit to the Stock Exchanges disclosures of related party transactions in the format as specified by the Board from time to time, and publish the same on its website.  It further provides that listed entity shall make such disclosures every six months on the date of publication of its standalone and consolidated.
2.	Regulation / Circular No.	Regulation 23(9) of LODR Regulations
3.	Deviations	The Company has filed the Related Party Transactions in XBRL format on the next day of publication of its standalone and consolidated financial results delayed by few hours.
4.	Action Taken by	NSE and BSE

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5.	Type of Action	Fine imposed by NSE and BSE
6.	Details of Violation	As stated in column 3 above
7.	Fine Amount	Rs.5,000/- (Rupees Five Thousand only) plus applicable GST each to BSE & NSE.
8.	Observations/Remarks of the Practicing Company Secretary	The listed entity has assured that it will take due care in future.
9.	Management Response	The Company faced the technical glitch and after attempting to file the xml several times, the Company fortunately succeeded to upload the same on 09/11/2023 at 02:14 AM, which caused a delay of around two hours.
10.	Remarks	The listed entity has requested both NSE and BSE for waiver of fine. These requests are under consideration of Stock Exchanges.

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

1.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	N.A.
2.	Regulation / Circular No.	N.A.
3.	Deviations	N.A.
4.	Action Taken by	N.A.
5.	Type of Action	N.A.
6.	Details of Violation	N.A.
7.	Fine Amount	N.A.
8.	Observations/Remarks of the Practicing Company Secretary	N.A.
9.	Management Response	N.A.
10.	Remarks	N.A.

**We further report that** There was no event of resignation of statutory auditor of the company during the review period and as such, the compliance of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019, issued by the Securities and Exchange Board of

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India on “Resignation of statutory auditors from listed entities and their material subsidiaries” is not applicable during the Review Period.

## Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Sharma and Trivedi LLP  
Company Secretaries



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**Sachin Sharma**  
Designated Partner  
FCS: 12788  
CP No.: 20423  
UDIN: F012788F000438719  
PR No.: 5560/2024

**Date: 24<sup>th</sup> May, 2024**  
**Place: Mumbai**