



Date: 14.08.2024

To,

BSE Limited

Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai -400001.

Attn: Listing Department

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2024 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Ref: Beekay Niryat Limited (Script Code: 539546)

Dear Sir/Madam,

As per the provisions of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") as amended read with SEBI circular CIR/ CFD/ CMD1/ 27/2019 dated February 08, 2019, every listed entity is required to submit an Annual Secretarial Compliance Report within 60 days from the end of financial year with the stock exchanges where the securities of the Company are listed. However, as per the provisions of Regulation 15 (2) of Chapter IV of the Listing Regulations, Regulation 24A shall not apply, in respect of the following classes of companies:

- a. The listed entity having paid up equity share capital not exceeding rupees ten crore and net worth not exceeding rupees twenty five crore, as on the last day of the previous financial year ; and
- b. Listed entity which has listed its specified securities on the SME exchange.

Provided that where the provisions of regulations 17 to 27, clauses (b) to (i) and (t) of sub-regulation (2) of regulation 46 and para C, D and E of Schedule V become applicable to a listed entity at a later date, it shall ensure compliance with the **same within six months from such date**:

In this regard this is to inform you that we declared our financial results for the quarter and year ended March 31, 2024 on **May 30, 2024**, and during the preparation of results we comes to know that the Net Worth have increased due to valuation of share investment of our non-listed associate entity. Therefore we could not comply of Corporate Governance before and the same becomes applicable on us, and as per the above mentioned proviso we have to comply with the same within six months from **May 30, 2024**.

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular no. CIR/CFD/CMD 1/27/2019 dated

————— **BEEKAY NIRYAT LIMITED** —————

111, SIGNATURE TOWER, DC 2 LAL KOTHI SCHEME, TONK ROAD, JAIPUR - 15
0141 4006454/5/6 | INFO@ABIL.CO.IN | CIN NO. L67120RJ1975PLC045573



February 08, 2019, we are enclosing herewith Secretarial Compliance Report for the year ended 31st March, 2024 issued by Mr. Abhishek Sharma, Practicing Company Secretary, Jaipur.

Kindly take the same on record.

Thanking you.

Yours faithfully,

For **Beekay Niryat Limited**

(Versha Goyal)
Company secretary & compliance officer
M. No. A72164

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Abhishek S & Associates

Practicing Company Secretaries
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Bapu Nagar, Jaipur - 302015
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SECRETARIAL COMPLIANCE REPORT OF

Beekav Nirvat Limited

CIN: L67120RJ1975PLC045573

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 "ABHISHEK S & ASSOCIATES", COMPANY SECRETARY IN WHOLE TIME PRACTICE, have examined:

- a) all the documents and records made available to us and explanation provided by "Beekav Nirvat Limited" (CIN: L67120RJ1975PLC045573) having its Registered Office at 111, Signature Tower, DC 2 Lalkothi Scheme, Tonk Road, Jaipur -302015 RJ ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity (Website: <http://www.BeekavNirvat.com/>)
- d) any other document/ filing, as may be relevant, which has been relied upon to make this Report, for the 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; **(Not applicable to the listed entity during the review period)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Share and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the listed entity during the review period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2021; **(Not applicable to the listed entity during the review period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021; **(Not applicable to the listed entity during the review period)**



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- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Registrar to an issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and Circular/guidelines issued thereunder;

- (j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; (**Not applicable during the review period**)
- (k) Other Regulations as applicable.

And circulars/ guidelines issued thereunder; and based on the above examination, 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.
- (b) The Listed entity has taken the following actions to comply with the observations made in previous reports; **Not applicable, as previous year Regulation 24A not applicable on the listed entity**
- (c) We report that, during the Review Period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	YES	-



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2.	<u>Adoption and timely updation of the Policies:</u> a) All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities b) All the policies are in conformity with SEBI Regulations and have been reviewed updated on time, as per the regulations/circulars/guideline issued by SEBI.	YES	-
3.	<u>Maintenance and disclosures on Website:</u> a) The listed entity is maintaining a functional website. b) Timely dissemination of the documents/information under a separate section on the website c) Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website	YES	-
4.	<u>Disqualification of Director:</u> None of the Directors of the Company was disqualified under Section 164 of the Companies Act, 2013	YES	-
5.	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> a) Identification of material subsidiary companies b) Requirement with respect to disclosure of material as well as other subsidiaries	NA	-
6.	<u>Preservation of Documents:</u> 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	YES	-



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	Regulations, 2015.		
7.	<u>Performance Evaluation:</u> 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.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained	YES	-
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosures under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder	YES	-
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with of SEBI (Prohibition of insider Trading) Regulation 3(5) & 3(6) Regulations, 2015.	YES	-
11.	<u>Action taken by SEBI or Stock Exchanges, if any:</u> 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 Regulations and circulars/guidelines issued thereunder.	NA	No action was initiated by SEBI or Stock Exchanges.



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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 Abhishek S & Associates
Practicing Company Secretaries

Abhishek Sharma
(Proprietor)
ACS - A59433
COP - 25039



Place: Jaipur
Date: 13.08.2024
UDIN: A059433F000970882