

BASANT AGRO TECH (INDIA) LTD.

95-96 C Mittal Court, Nariman Point, Mumbai 400 021

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CIN No:- L24120MH1990PLC058560

Date: - 30.05.2024

To
Manager,
Department of Corporate Services,
The Bombay Stock Exchange Ltd.
Mumbai .

Sub:- Annual Secretarial Compliance Report for the Financial Year ended March 31, 2024 under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir,

Pursuant to regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with Circular No. CIR/CFD/CMDI/27/2019 dated February 08, 2019, enclosed herewith the Annual Secretarial Compliance Report issued by Abhilasha Chaudhary & Associates, Practicing Company Secretaries, for the financial year ended March,31,2024.

Thanking you
Yours faithfully,
For BASANT AGRO TECH (INDIA) LTD.

for Basant Agro Tech. (India) Ltd.

Mr.
Company Secretary

COMPANY SECRETARY



To
The Board of Directors
Basant Agro Tech (India) Limited.
Plot No 13/2, Kaulkhed Akola near S.T.
Workshop, Akola MH -444001

Dear Sir/Madam,

Subject: Annual Secretarial Compliance Report for the Financial Year 2023-24.

I have been engaged by M/s. **Basant Agro Tech (India) Limited.** (hereinafter referred to as "the Company") bearing CIN: L24120MH1990PLC058560 whose equity shares listed on **Bombay Stock exchange** to conduct audit in terms of Regulations 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with **SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019** and to issue the Annual Secretarial Compliance Report thereon.

It is responsibility of the management of the Company to maintains records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and Circulars/ guidelines issued thereunder from time to time and to ensure that the systems are adequate and are operating effectively.

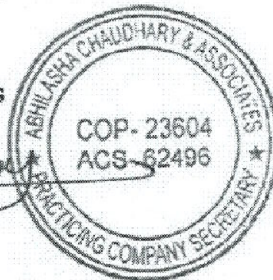
Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with guidance note on Annual Secretarial Compliance report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For Abhilasha Chaudhary & Associates
Practicing Company Secretary

Abhilasha

Abhilasha Chaudhary, Proprietor
Membership No: 62496
CP No: 23604



UDIN: A062496F000502639

Date: 30/05/2024



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**SECRETARIAL COMPLIANCE REPORT OF BASANT AGRO TECH (INDIA) LIMITED FOR THE
FINANCIAL YEAR ENDED 31ST MARCH, 2024**

To,
Board of Directors,
Basant Agro Tech (India) Limited.
Plot No 13/2, Kaulkhed Akola near S.T.
Workshop, Akola MH -444001

We have examined

- (a) all the documents and records made available to us and explanation provided by M/s. **Basant Agro Tech (India) Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **March 31, 2024** 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (registrars to an issue and Share Transfer Agent) Regulations, 1993, regarding act and dealing with client.

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

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





Sr. No.	Action taken by	Details of Non-compliance	Details of action taken	Remarks by PCS, if any
1	BSE Ltd.	Board recommended a dividend of 8% on equity share for the year ended 31 st March, 2023 But not mention in board meeting intimation for dated 15 th May, 2023.	BSE Ltd. has imposed a penalty of Rs. 11,800/- on the company, under regulation 29 of SEBI (LODR), Regulations 2015	Board recommended a dividend of 8% on equity share for the year ended 31 st March, 2023 But not mention the agenda of Dividend declaration discussion by Board of Directors in its meeting as per board meeting intimation for dated 15 th May, 2023.

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

Sr. No.	Observations of PCS in previous reports	Actions taken by listed entity, if any	Comments of the PCS on the actions taken by the listed entity
1	Non-compliance under Regulation 23(9) of SEBI (LODR) Regulations 2015, for the quarter ended 31.03.2022	Penalty levied of Rs. 23,600/- including GST imposed by BSE Ltd. on the Company	The Company has informed to us, that the SOP fine of Rs. 23,600/- including GST paid by the Company dated 02 nd August, 2022 and the company is complied with the Compliance of Regulation 23(9) of SEBI (LODR) Regulations 2015 for F.Y. 2023-24.

The additional affirmations by Practicing Company Secretary (PCS) in Annual Secretarial Compliance (ASCR) in terms of the BSE Circular reference No. 20230410-41 dated; April 10, 2023, are given in the attached Annexure.

Annexure

Additional affirmations by Practicing Company Secretary (PCS) in Annual Secretarial Compliance (ASCR) in terms of BSE Circular reference no. 20230410-41 dated: April 10, 2023:

Sr. No.	Particulars	Compliance Status Yes/No/NA	Remarks by PCS
1.	Secretarial Standards: The Compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the ICSI, as notified by the CG under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Satisfactory





2.	Adoption and timely Updation of the Policies: 1. All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities 2. All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes Yes	Satisfactory
3.	Maintenance and disclosures on Website: - 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	Satisfactory
4.	Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Satisfactory
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: a). Identification of material subsidiary companies b). Disclosure requirement of material as well as other subsidiaries	Yes	Satisfactory
6.	Preservation of Documents: 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	Satisfactory
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	Satisfactory
8.	Related Party Transactions: 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	Yes NA	Satisfactory No such cases observed





	approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.		
9.	Disclosure of events or information: 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	Satisfactory
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	As per the verification we found that the company has purchase and installed the SDD software during the audit period, as required under Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015, and started making entries in the SDD software during the year, and before that the company was maintaining the records manually.
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been 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 except as provided under separate paragraph herein (**).	Yes	There is no action was taken during the audit review period for the F. Y. 2022-23 against the listed entity/ its promoters/directors/ material subsidiaries either by SEBI or by Stock Exchange. Except the SOP fine of Rs. 11,800/-including GST which was paid in F.Y. 2023-24, imposed by BSE Ltd. for Board recommended a dividend of 8% on equity share for the year ended 31 st March, 2023 But not mention in board meeting intimation for dated 15 th May, 2023.
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	No additional non-compliance was observed for any SEBI regulation/circular/guidance note etc.





Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Remarks by PCS
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	<p>NA</p> <p>NA</p> <p>NA</p>	<p>No such cases were observed during the review period.</p>
2.	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/ its material subsidiary to the Audit Committee:</p> <p>a). In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b). In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p>	<p>NA</p>	<p>No such cases were observed during the review period.</p>





	<p>c). The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>	NA	No such cases were observed during the review period.
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	NA	No such cases were observed during the review period.

For Abhilasha Chaudhary & Associates
Practicing Company Secretary

Abhilasha

Abhilasha Chaudhary, Proprietor
Membership No: 62496
CP No: 23604



UDIN: A062496F000502639
Date: 30/05/2024

