

BERVIN INVESTMENT & LEASING LTD.

CIN No.: L65993DL1990PLC039397,
Regd. Office: 607, Rohit House, 3, Tolstoy Marg, New Delhi – 110 001,
Website: www.bervin.com, Email Id: secretary@bervin.com

May 28, 2024

BSE Limited
Corporate Relationship Department
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai- 400001

Scrip Code: 531340

Sub: Intimation of Annual Secretarial Compliance Report in terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred as Listing Regulation) with yearly ended March 31, 2024

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, from time to time, we hereby enclose the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2024, issued by M/s. Manisha Gupta & Associates, Company Secretaries.

You are requested to take the same on record.

Thanking You,

Yours Faithfully,

FOR BERVIN INVESTMENT AND LEASING LIMITED

KALPANA
UMAKANTH

Digitally signed by
KALPANA UMAKANTH
Date: 2024.05.28
18:00:27 +05'30'

**KALPANA UMAKANTH
COMPANY SECRETARY
ENCL: AS ABOVE**

Manisha Gupta
B. Com (H), L.L.B, FCS

MANISHA GUPTA & ASSOCIATES
COMPANY SECRETARIES
WZ-1003, IInd Floor, Rani Bagh, Delhi-
110034
Ph: - 011-45053912
Mobile: - 9911662021,9911433045
E-mail : manisha.pcs@gmail.com

Secretarial Compliance Report of Bervin Investment and Leasing Limited for
the year ended 31st March, 2024

To,

Bervin Investment and Leasing Limited
607 Rohit House 3 Tolstoy Marg
New Delhi - 110001

We Manisha Gupta & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by Bervin Investment and leasing Limited (“the listed entity/ Company”)
- (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 upto make this certification,

For the year ended 31st March, 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, (Including any amendments and modifications from time to time) 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 Company under review period.**
- (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 to the Company under review period.

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

Not Applicable to the Company under review period.

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

Not Applicable to the Company under review period.

- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;

Not Applicable to the Company under review period.

- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

And based on the above examination, we hereby report that, during the review period:

The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except as follows

Sr.No	Compliance Requirement (Regulation s/ circulars / guidelines including specific clause)	Regulation No. / Circular No.	Deviations	Actions taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Responder	Remarks
Not Applicable										

- (a) The Company has taken the following actions to comply with the observations made in previous reports as specified below:-

Sr.No	Compliance Requirement (Regulation s/ circulars / guidelines including specific clause)	Regulation No. / Circular No.	Deviations	Actions taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Responder	Remarks
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specific clause)									
Not Applicable									

We further report that during the review period all the appointment/reappointment/resignation of statutory auditor of the Company and the Company was in compliance with Para 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMDI/114/2019 dated October 18, 2019.

We also report that in terms of the circulars issued by BSE Limited and National Stock Exchange of India Limited on March 16, 2023 respectively, I also affirm the following:-

S.No	Particulars	Compliance status (Yes/No/NA)	Observations/Remarks by PCS*
1	<p><u>Secretarial Standard</u></p> <p>The compliances of listed entities are in accordance with the applicable Secretarial Standards issued by the Institute of Company Secretaries India (ICSI)</p>	Yes	None
2	<p><u>Adoption and timely updation of the Policies:</u></p> <p>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company.</p> <p>All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per , the regulations/ circulars/ guidelines issued by SEBI</p>	Yes	None
3	<p><u>Maintenance and disclosures on Website:</u></p> <p>The Company is maintaining a functional website Timely dissemination of the documents/information under a separate section on the website.</p>	Yes	None

	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.		
4	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	None
5	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	Not Applicable	The Company has no subsidiary therefore, the compliances related to Subsidiaries of Listed Entities are Not Applicable.
6	<p><u>Preservation of Documents:</u></p> <p>The Company 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</p>	Yes	None
7	<p><u>Performance Evaluation:</u></p> <p>The Company has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations</p>	Yes	None
8	<p><u>Related Party Transactions:</u></p> <p>(a) The Company has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the Company shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee.</p>	Not Applicable	There are no related party transaction during the period under review, therefore Compliances related to Related Party

			are Not Applicable.
9	<u>Disclosure of events or information:</u> The Company has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
10	<u>Prohibition of Insider Trading:</u> The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> 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 Regulations and circulars/ guidelines issued thereunder	Yes	None
12	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	None

Place: New Delhi

Date: 28.05.2024

**For Manisha Gupta & Associates
(Company Secretary)**

MANISHA GUPTA
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Digitally signed by
MANISHA GUPTA
Date: 2024.05.28
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**Manisha Gupta
Practicing Company Secretary
Mem. No. F6378
CP. No. 6808
UDIN: F006378F000468433**