

The Deputy General Manager
The Bombay Stock Exchange Ltd
P. J. Towers, 25th Floor
Dalal Street,
Mumbai-400001

Date: 30-05-2019

Dear Sir,

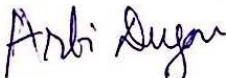
Re: Script Code: 520127

SUB: Annual Secretarial Compliance Report for the year ended March 31, 2019

Pursuant to SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 8, 2019 please find enclosed the Annual Secretarial Compliance Report of the Company for the financial year March 31, 2019 issued by Anand Khandelia, Company Secretaries.

This is for your information & records.

Thanking You,
For Balurghat Technologies Ltd


Arti Dugar
Company Secretary



**Secretarial Compliance Report of M/s Balurghat Technologies Limited for
the year ended 31st March, 2019**

*(Pursuant to circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019 issued by the Securities Exchange
Board of India)*

I, Anand Khandelia, Practising Company Secretary have examined:

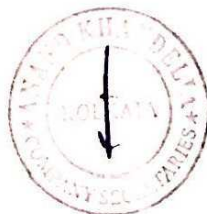
- (a) all the documents and records made available to us and explanation provided by M/s Balurghat Technologies Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may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

for the year ended 31st March, 2019 ("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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;



- (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 and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Any other regulations, circulars etc. issued by SEBI applicable to the Company.

And circulars/ guidelines issued thereunder;

and based on the above examination, I 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, However regulations mentioned above under clause (b), (d), (e), (f) and (g) are not applicable to the company during the review period; except in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations/ guidelines specific clause)	Requirements circulars / including	Deviations	Observations/ Remarks of the Practicing Company Secretary
Not Applicable				

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
Not Applicable				

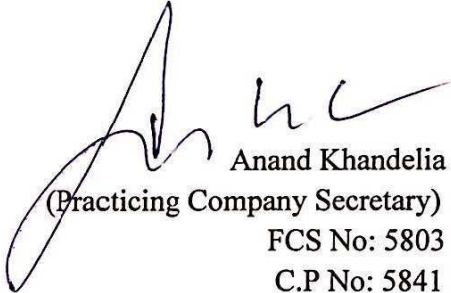


(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

(e)

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: Kolkata
Date: 30.05.2019


Anand Khandelia
(Practicing Company Secretary)
FCS No: 5803
C.P No: 5841

