

POST BOX NO. 10077
TEL. NOS.: +91 22 2207197101
FAX :0091-22- 2207 1612 / 677
Email: writetous@bbtcl.com
Website: www.bbtcl.com
CIN: L99999MH1863PLC000002



THE BOMBAY BURMAH TRADING CORPORATION, LIMITED

REGD. OFFICE: 9, WALLACE STREET, FORT,
MUMBAI 400 001, INDIA.

29th May, 2019

To,
The Secretary,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 023
Equity Scrip Code: 501425
Debenture Scrip: 956460

To,
Manager- Listing,
National Stock Exchange of India Limited
Exchange Plaza,
Plot no. C/1, G Block,
Bandra-Kurla Complex
Bandra (E), Mumbai - 400 051
Symbol: BBTC EQ

Dear Madam / Sir,

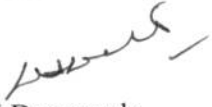
Subject: Submission of Annual Secretarial Compliance Report for year ended 31st March, 2019

In compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, please find enclosed copy of Annual Secretarial Compliance Report dated 29th May, 2019 for the Financial Year 2018-19 issued by Mr. Tushar Shridharani, Practicing Company Secretary and the Corporation's Secretarial Auditor.

You are requested to take the same on record.

Thanking you,

Yours faithfully,
For The Bombay Burmah Trading Corporation Limited


N H Datanwala
Chief Financial Officer
Encl: a/a

TUSHAR SHRIDHARANI

B. Com., LL.B., F.C.S.

Tel. : (022) 2208 5764 / 2208 5765
Email : tushar@tusharshri.com
Web. : www.tusharshri.com

10, New Marine Lines
417, Jolly Bhavan No. 1
Mumbai – 400 020

Secretarial compliance report of The Bombay Burmah Trading Corporation, Limited for the year ended 31st March, 2019

I, Tushar Shridharani, have examined:

- (a) all the documents and records made available to us and explanation provided by The Bombay Burmah Trading Corporation 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) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
 - 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 except in respect of matters specified below.

Sr. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
Nil			

- (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 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 violations	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations / remarks of the Practicing Company Secretary, if any
Nil				

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ... (The years are to be mentioned)	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: Mumbai
 Date: 29th May, 2019



Tushar Shridharani
(Tushar Shridharani)
 Practicing Company Secretary
 FCS: 2690 / COP: 2190