

31<sup>st</sup> July, 2020

*Scrip Code: 532290/ BLBLIMITED*  
*ISIN No.: INE791A01024*

To,

The Manager (Listing)  
**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai-400 001

To,

The Manager (Listing)  
**National Stock Exchange of India Limited**  
Exchange Plaza,  
Bandra Kurla Complex,  
Bandra (East),  
Mumbai-400 051

**Subject: Annual Secretarial Compliance Report for the Financial Year 2019-20**

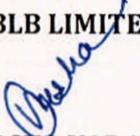

Dear Sir/Ma'am,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read alongwith SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by Mr. Shashikant Tiwari, Partner of M/s. Chandrasekaran Associates, Practicing Company Secretaries for the financial year 2019 -20.

This is for your information and record.

Thanking You,

For **BLB LIMITED**

  
  
**(VARSHA YADAV)**  
**COMPANY SECRETARY**

**M No : A39192**  
**Place : New Delhi**

**BLB Limited**

CIN : L67120DL1981PLC354823  
Corporate Member : NSE

**Registered Office :** H.No. 4760-61/23, 3rd Floor, Ansari Road, Darya Ganj, New Delhi-110 002 Tel : 011-49325600

**Website :** www.blblimited.com, Email : infobl@blblimited.com

**SECRETARIAL COMPLIANCE REPORT OF BLB LIMITED  
FOR THE YEAR ENDED MARCH 31, 2020**

To,  
The Members  
**BLB Limited**  
H. No. 4760-61/23, 3rd Floor, Ansari Road,  
Daryaganj, New Delhi 110002

We M/s. Chandrasekaran Associates have examined:

- (a) All the documents and records made available to us and explanation provided by BLB 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, 2020 ("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 to the extent applicable;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; Not Applicable during the year under review.
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 to the extent applicable;

11-F, Pocket Four | Mayur Vihar Phase One | Delhi - 110 091 | Tel. +91-11-2271 0514  
info@cacsindia.com | www.cacsindia.com

**SHASHIKAN  
T TIWARI** Digitally signed by  
SHASHIKANT TIWARI  
Date: 2020.06.26  
11:46:36 +05'30'

- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; Not Applicable during the year under review.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable during the year under review.
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable during the year under review;
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable during the year under review;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 to the extent applicable;
- (i) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client to the extent of securities issued;
- (k) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009 to the extent applicable.

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, except in respect of matters specified below:-

<b>Sr. No</b>	<b>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)*</b>	<b>Deviations</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
	NIL	NIL	NIL

\* *The Board of Directors of the Company in its meeting held on 01.10.2019 has re-appointed Ms. Dhvani Jain as Woman Independent Director for a second term of 5 years w.e.f. 20.10.2019 to 19.10.2024, subject to necessary approvals. In our view, the Company was required to give disclosure of such re-appointment to the stock exchanges in terms of Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular no. CIR / CFD / CMD / 4 / 2015 dated 09.09.2015.*

*However, the management has taken an opinion on the subject matter and is of view that Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 SEBI (LODR) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD/4/2015 dated September 09, 2015 prescribes the requirement of disclosure to the stock exchanges only when there is a change in directors. The board has only re-appointed Ms. Dhvani Jain as an Independent Director for a second term of 5 years and the same neither amounts to any change in the directorship of the Company as there is no break in term of directorship nor any change in the terms of her appointment nor any change in constitution of the Board of Directors of the Company. Therefore, as per the management, since there has been no change in the constitution of Board of directors of the company upon re-appointment of Ms. Dhvani Jain as Independent Director, there was no requirement for making any disclosure to stock exchange under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 SEBI (LODR) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD/4/2015 dated September 09, 2015.*

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my/our examination of those records.
- (c) The company has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment of statutory auditor of the Company.
- (d) 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:

11-F, Pocket Four | Mayur Vihar Phase One | Delhi - 110 091 | Tel. +91-11-2271 0514  
info@cacsindia.com | www.cacsindia.com

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/ remarks of the Practicing Company Secretary, if any.</b>
	NIL	NIL	NIL	NIL

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

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended March 31, 2020.</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
Not Applicable during the year under review				

For **Chandrasekaran Associates**

Company Secretaries

**SHASHIKANT TIWARI**  
Digitally signed by  
SHASHIKANT TIWARI  
Date: 2020.06.26  
11:47:18 +05'30'

**Shashikant Tiwari**

Partner

Membership No. ACS No.: 28994

Certificate of Practice No.: 13050

UDIN: A028994B000385460

Date: 26.06.2020

Place: Delhi

Notes:

*(i) Due to restricted movement amid COVID-19 pandemic, we conducted the secretarial audit by examining the Secretarial Records including Minutes, Documents, Registers and other records etc., and some of them received by way of electronic mode from the Company and could not be verified from the original records. The management has confirmed that the records submitted to us are the true and correct.*

*(ii) This Report is limited to the Statutory Compliances on laws / regulations / guidelines listed in our report which have been complied by the Company up to the date of this Report pertaining to Financial Year 2019-2020. We are not commenting on the Statutory Compliances whose due dates are extended by Regulators from time to time due to COVID-19 or still there is time line to comply with such compliances.*

**SHASHIKA  
NT TIWARI** Digitally signed by  
SHASHIKANT TIWARI  
Date: 2020.06.26  
11:47:30 +05'30'