

# **BSEL INFRASTRUCTURE REALTY LIMITED**

CIN : L99999MH1995PLC094498

Regd. Office : 737, 7th Floor, The Bombay Oilseeds & Oils Exchange Premises Co-op, Soc. Ltd.,  
The Commodity Exchange, Plot No. 2,3 & 4, Sector-19-A, Vashi, Navi Mumbai-400 705.  
Tel. : +91-22-6512 3124, Tele fax : +91 22 2784 4401, website : www. bsel.com



Date: 7<sup>th</sup> June, 2021

To, <b>BSE Limited</b> Listing Department, Phiroze Jeejeebhoy Towers Dalal Street; Fort Mumbai 400 001 Script Code: 532123 ISIN: INE395A01016	<b>National Stock Exchange of India Ltd.</b> Exchange Plaza, 5th Floor Plot No. C/1, G Block; Bandra (East) Mumbai 400 051  Symbol: BSELINFRA ISIN: INE395A01016
--------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Dear Sir/Madam,

**Subject: - Submission of Annual Secretarial Compliance Report for year ended 31<sup>st</sup> March 2021 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements), 2015.**

With reference to the above, please find enclosed herewith the copy of the Annual Secretarial Compliance Report for year ended 31<sup>st</sup> March 2021 issued by Sunita Dube & Associates, Practicing Company Secretary pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements), 2015.

This is for your information and record.

Kindly take the above on record and oblige.

Yours truly,

**For BSEL Infrastructure Realty Limited**

A handwritten signature in black ink, appearing to read 'Alpa Hakani', is written over a light blue circular stamp.

**Alpa Hakani**

**Company Secretary & Compliance Officer**

Encl: a/a



# Sunita Dube & Associates

Office Address: 2, Ground Floor, New Bhushan Apartment, Near Sai Pranay Hotel, Survevadi Teen Hath Naka Thane West-400604: (M) +919967790055(O)+918433777606 E-mail: [cssunitadube@gmail.com](mailto:cssunitadube@gmail.com)

## **Secretarial Compliance Report of BSEL Infrastructure Realty Limited** **(L99999MH1995PLC094498)**

**For the Financial Year Ended 31<sup>st</sup> March, 2021**

**To**

**Board of Directors**

**BSEL Infrastructure Realty Limited**

737,7th Floor, The Bombay Oil Seeds & Oil

Ex. Premises Co-op Soc. Ltd. Commodity

Ex. Sector-19, PL 2,3&4, Vashi Navi Mumbai 400705

I have examined:

- (a) all the documents and records made available to us and explanation provided by **BSEL INFRASTRUCTURE REALTY 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 31<sup>st</sup> March, 2021 ("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 (**there were no events requiring compliance during the 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(**there were no events requiring compliance during the Review Period**);
- (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 (**there were no events requiring compliance during the Review Period**);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (**there were no events requiring compliance during the Review Period**);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulation");

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 in so far 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 violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/remarks of the Practicing Company Secretary, if any.
1.	NSE	As per SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 (SOP Circular) Regulation 17(1) the company is required to have number of the board member not less than six.	Fine	Company has complied with the necessary regulation with appointment of Mr. Bhavik Soni as director of the Company w.e.f October 31, 2020

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

Sr. No.	Observations/remarks of the Practicing Company Secretary, in 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 during the year under review				

**Note:** In view of the second wave of the COVID19 pandemic and as per the guidance issued by the Institute of Company Secretaries of India (ICSI) for carrying out professional assignments, the Secretarial Compliance Report in term of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 was conducted through electronic mode for verification.

**For, Sunita Dube & Associates**

SUNITA  
VIDYASAGAR  
AR DUBE

Digitally signed  
by SUNITA  
VIDYASAGAR  
DUBE  
Date: 2021.06.07  
13:30:32 +05'30'

**Sunita Dube**  
**Practicing Company Secretary**  
**ACS- 48556/ CP – 17708**

**Date: 07/06/2021**

**Place: Thane**

**UDIN: A048556C000427957**