



**SECRETARIAL COMPLIANCE REPORT OF BAZEL INTERNATIONAL LIMITED**  
**FOR THE YEAR ENDED MARCH 31, 2019**

I CS Mohit Singhal have examined:

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

for the year ended March 31, 2019 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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");

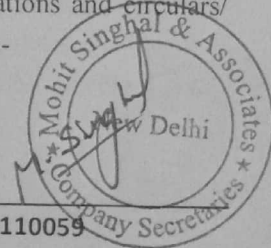
The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

and based on the above examination, I/We hereby report that, during the Review Period:

- The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-



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Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	<p><b>As per Regulation 14 of the SEBI (LODR) Regulation, 2015:-</b> The listed entity shall pay all such fees or charges, as applicable, to the recognised stock exchange(s), in the manner specified by the Board or the recognised stock exchange(s).</p>	<p>The Company made the payment to the Stock exchange fees after the due date as specified under the Regulation.</p>	<p>The Company made the payment for the Financial year 2018-19 on 24.08.2018.</p>
2	<p><b>As per Regulation 34 (1) of the SEBI (LODR) Regulation, 2015:-</b> The listed entity shall submit the annual report to the stock exchange within twenty one working days of it being approved and adopted in the annual general meeting as per the provisions of the Companies Act, 2013.</p>	<p>The Company is required to submit the Annual Report by 20.08.2018, however the Company filed on 27.08.2018.</p>	<p>The Company is required to submit the Annual Report by 20.08.2018, however the Company filed on 27.08.2018 for which the BSE levied a penalty of Rs. 16,520/- on the Company which is still pending for payment on part of the Company.</p>
3	<p><b>As per Regulation 47 (4) of the SEBI (LODR) Regulation, 2015:-</b> The information at sub-regulation (1) shall be published in at least one English language national daily newspaper circulating in the whole or substantially the whole of India and in one daily newspaper published in the language of the region, where the registered office of the listed entity is situated.</p>	<p>The Company has published majority of publication in Hindi Newspaper in English Language.</p>	<p>The Company has published majority of publication in Hindi Newspaper in English Language.</p>

- (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 Act/ 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	Bombay Stock Exchange	The Company didn't submit its Annual Report within the period as specified under Regulation 34 (1) of the SEBI (LODR) Regulation, 2015	Fine of Rs. 16,520/- (Rupees Sixteen Thousand Five Hundred Twenty Only)	The payment of fine is still pending on part of the Company.

(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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NA				

For Mohit Singhal & Associates  
Company Secretaries



Place: New Delhi  
Date: May 30, 2019

Mohit Singhal  
Proprietor  
ACS No.: 43204  
CP No.: 15995