

May 24, 2022

**BSE Limited**

Corporate Relationship Department,  
Phiroze Jeejebhoy Towers,  
Dalal Street,  
Mumbai – 400 001.

**SCRIP CODE: 503960**

**National Stock Exchange of India Limited**

Listing Department,  
Exchange Plaza,  
Bandra Kurla Complex, Bandra (E),  
Mumbai – 400 051

**SCRIP CODE: BBL**

Dear Sir / Madam,

**SUB: Annual Secretarial Compliance Report for the Financial Year 2021-2022**

Pursuant to the Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (*as amended*) read with SEBI Circular No CIR/CFD/CMD1/27/2019, dated February 8, 2019, enclosed herewith the Annual Secretarial Compliance Report for the financial year 2021-2022, issued by M/s N L Bhatia & Associates, Practicing Company Secretaries.

You are requested to take the same on your record.

Thanking you,

Yours sincerely,  
For Bharat Bijlee Limited



**Durgesh N. Nagarkar**  
Company Secretary & Senior General Manager,  
Legal



Encl.: a/a



**N L BHATIA & ASSOCIATES**  
**PRACTISING COMPANY SECRETARIES**

Tel. : 91-022-2510 0718  
Tel. : 91-022-2510 0698  
E-mail : navnitlb@hotmail.com  
brupadhyay@hotmail.com  
Website : www.nlba.in

To,  
**The Board of Directors,**  
**BHARAT BIJLEE LIMITED,**  
CIN: L31300MH1946PLC005017  
Electric Mansion, 6<sup>th</sup> Floor Appasaheb Marathe Marg,  
Prabhadevi, Mumbai 400 025

**Sub: Annual Secretarial Compliance Report for the Financial Year 2021-2022**

Dear Sirs,

We have been engaged by **BHARAT BIJLEE LIMITED** (hereinafter referred to as the 'Company') bearing CIN: L31300MH1946PLC005017 whose equity shares are listed on National Stock Exchange of India Limited and BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report for the Financial Year 2021-2022 is enclosed.

**Date:** May 23, 2022  
**Place:** Mumbai

**For M/s N L Bhatia & Associates**  
**Practicing Company Secretaries**  
**UIN: P1996MH055800**



Bhaskar  
Bharat  
Upadhyay

Digitally signed by  
Bhaskar Bharat  
Upadhyay  
Date: 2022.05.23  
15:44:10 +0530'

**Bhaskar Upadhyay**  
**Partner**  
**FCS: 8663**  
**CP. No. 9625**

**'ANNEXURE A'**

**Secretarial compliance report of Bharat Bijlee Limited for year ended 31<sup>st</sup> March, 2022**

We, **M/s N L Bhatia & Associates**, Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Bharat Bijlee 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;
- (e) books, papers, minute books, forms and returns filed;

for the year ended 31<sup>st</sup> March, 2022 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:-

1. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
2. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
3. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
4. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable during the Financial Year)**
5. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable during the Financial Year)**
6. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable during the Financial Year)**



7. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the Financial Year)**
8. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the Company during the Financial Year).**
9. Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **Not applicable to the Company during the financial year;**

and based on the above examination, we hereby report that, for the year ended 31<sup>st</sup> March, 2022;

- (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
None			

- (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.	Actions taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practising Company Secretary, if any.
None				

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

Sr. No.	Observations of the Practising 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 Practising Company Secretary on the actions taken by the listed entity
Not Applicable				

Date: May 23, 2022  
Place: Mumbai

For N. L. Bhatia & Associates  
Practising Company Secretaries  
UIN: P1996MH055800  
UDIN: F008663D000363908



Bhaskar  
Bharat  
Upadhyay

Digitally signed by  
Bhaskar Bharat  
Upadhyay  
Date: 2022.05.23  
15:45:01 +05'30'

**Bhaskar Upadhyay**  
Partner  
FCS: 8663  
CP. No. 9625