



**B L KASHYAP**  
WE BUILD YOUR WORLD

June 15, 2020

Department of Corporate Services, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001	Listing Department, National Stock Exchange of India Ltd, Exchange Plaza, Plot No. C/1, G Block, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051
ISIN Code	: INE350H01032
Scrip Code : 532719	Trading Symbol : BLKASHYAP

Dear Sir / Madam,

**Sub: Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2020**

With reference to the captioned subject and pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed Annual Secretarial Compliance Report issue by Ms. Sunita Verma, Practicing Company Secretary for the financial year ended March 31, 2020.

Kindly take the above information on your record.

Thanking you,

Yours faithfully,

For B.L. Kashyap and Sons Limited

  
Pushpak Kumar  
GM-Corporate Affairs & Company Secretary  
M. No.: F6871



Encl: as above

**B L Kashyap & Sons Ltd.**  
(CIN : L74899DL1989PLC036148)  
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**SUNITA VERMA**  
Company Secretary

**SECRETARIAL COMPLIANCE REPORT**  
**of**  
**B. L. Kashyap and Sons Limited**  
**for the year ended 31<sup>st</sup> March, 2020**

**To**  
**B. L. Kashyap and Sons Limited**  
**409, 4<sup>th</sup> Floor DLF Tower-A, Jasola**  
**New Delhi-110025**

I, Sunita Verma, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by B. L. Kashyap and Sons 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 31.03.2020 ("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;
- (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; (**not applicable to the company during the period under review**)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**not applicable to the company during the period under review**)





- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(not applicable to the company during the period under review)**
- (g) 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 period under review)**
- (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/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:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	The Company is required to allot warrants after realization of funds of an amount equivalent to at least 25% of the consideration determined in terms of regulation 164 shall be paid against each warrant on the date of allotment of warrants and the balance 75% of the consideration shall be paid at the time of allotment of the equity shares.	Reg. 169(2) of SEBI (Issue of Capital and Disclosure Requirements), Regulation, 2018	The Company had allotted warrants in the month of August 2017 before realization of 25% upfront money and the same has been condoned by the SEBI in the month of June 2019. However balance 75% has been realized at the time of allotment of equity shares.

- (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:





**SUNITA VERMA**  
Company Secretary

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	SEBI	Non-compliance of Reg. 169(2) [erstwhile Reg. 77(2) of SEBI ICDR Regulation 2009] of SEBI (Issue of Capital and Disclosure Requirements), Regulation, 2018	Warning letter	SEBI has condoned such non-compliance with a view to avoid recurrence of such lapses in future.

(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 .....	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	Delay in conversion of warrants within 18 months from the date of allotment	NA	Fine imposed by the stock exchanges had been paid by the company within prescribed time	The Company has paid fine for 7 days delay as required by SEBI

Place: New Delhi

Date: 09/06/2020



**SUNITA VERMA**

FCS No.: 6724

C P No.: 7276

UDIN- F006724B000329191