

BAZEL INTERNATIONAL LTD.

Regd. Off.: Shop No 1, 1st Floor, CW-155, Sanjay Gandhi Transport Nagar, New Delhi 110042
New Delhi 110042, Ph. No.: 011-69999159, E-mail: bazelinternational@gmail.com
Website: www.bazelinternationalltd.com, CIN: L65923DL1982PLC290287

30th June, 2021

To,

**The Listing Department,
BSE Limited,
PhirozeJeejeebhoy Towers,
Dalal Street, Mumbai – 400 001
(Scrip Code: 539946)**

ISIN: INE217E01014

Sub: Submission of Annual Secretarial Compliance Report for Bazel International Ltd. ("the Company") for the year ended 31st March, 2021

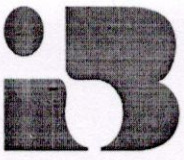
Dear Sir(s),

As per **Regulation 15 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015** ("Listing Regulations"), the provisions of Chapter IV of the said Listing Regulations, 2015 (as amended from time to time), shall be applicable to all Companies whose specified securities are listed on any recognized stock exchange either on the main board or on SME Exchange or on institutional trading platform. However, the Compliance with the corporate governance provisions as specified in Regulations 17, 17A, 18, 19, 20, 21, 22, 23, 24, 24A, 25, 26, 27 and clauses (b) to (i) of sub-regulation (2) of Regulation 46 and Para C, D and E of Schedule V shall not be mandatory, for the time being, in respect of the following class of Companies:

- A. The listed entity having paid up equity share capital not exceeding Rs.10 Crore and Net Worth not exceeding Rs.25 Crore, as on the last day of the previous financial year (31st March, 2020 in this case);
- B. The Listed Entity which has listed its specified securities on the SME Exchange.

Further, it is provided that where the provisions of regulations specified becomes applicable to a listed entity at a later date, such listed entity shall comply with the requirements of those regulations within 6 months from the date on which the provisions became applicable to the listed entity.

In view of the aforesaid, I would like to apprise you that provisions stipulated under Regulations 17, 17A, 18, 19, 20, 21, 22, 23, 24, 24A, 25, 26, 27 and clauses (b) to (i) of sub-regulation (2) of Regulation 46 and Para C, D and E of Schedule V of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 **are not applicable on Bazel International Ltd.** ("the Company") since its paid-up share capital and net worth doesn't



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exceeds the prescribed threshold limits as on the last day of the previous financial year i.e- 31st March, 2020.

The paid up share capital of the Company is Rs. 1,45,50,000/- (Rupees One Crores Forty Five Lakhs Fifty Thousand Only) and the Net Worth is 14,54,51,418.06/- (Rupees Fourteen Crores Fifty Four Lakhs Fifty One Thousand Four Hundred Eighteen and Six Paise only).

But the Company is voluntarily submitting its Annual Secretarial Compliance Report for the financial year ending 31st March, 2021 in compliance with Regulation 24A(2) of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 read with Circular No. CIR/CFD/CMDI/27/2019 dated 08/02/2019. Please find enclosed herewith the Annual Secretarial Compliance Report, certifying that the Company is in compliance with all the applicable SEBI Regulations and circulars/ guidelines issued there under, for the year ended 31st March, 2021.

Kindly take the same on records.

Thanking you,

Yours faithfully

For Bazel International Ltd.




Preeti Puri

(Company Secretary and Compliance Officer)

Office Address: Shop No 1, 1st Floor, CW-155, Sanjay Gandhi Transport Nagar, New Delhi 110042

Encl: As mentioned above



MEENU G. & ASSOCIATES

(Company Secretaries)

Corporate Office: 9089, Multani Dhanda, Pahar Ganj, New Delhi-110055

Mobile No.: 8920888492, Email Id : csmeenu1@gmail.com

**ANNUAL SECRETARIAL COMPLIANCE REPORT
OF**

BAZEL INTERNATIONAL LIMITED

For the Financial year ended on 31st March, 2021

[Pursuant to Circular No. CIR/CFD/CMDI/27/2019 dated 08/02/2019 issued by Securities and Exchange Board of India]

To

The Members

BAZEL INTERNATIONAL LTD.

Add: Shop No 1, 1st Floor, CW-155,

Sanjay Gandhi Transport Nagar,

New Delhi 110042

We have examined:

- (a) All the documents and records made available to us (through email or online mode due to COVID 19 outbreak) and explanation provided by BAZEL INTERNATIONAL 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 31st 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");
- These 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 - **Not Applicable.**
 - (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.**
- (e) Securities and Exchange Board of India (Share-Based Employee Benefits) Regulations, 2014 - **Not Applicable.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not Applicable.**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 - **Not Applicable.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
- (i) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018.

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 there under.
- (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 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.	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.
NA				

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not applicable**

For CS MEERU Q. & ASSOCIATES
Company Secretaries

Proprietor
Member No. 52702
COP No: 19501
UDIN: A052702C000433005



Place: New Delhi
Date: 08.06.2021