



**Date:** December 29, 2024

To,  
BSE Limited  
P. J. Towers, 25th Floor, Dalal Street,  
Mumbai - 400001.  
Scrip Code: 532368

To,  
National Stock Exchange of India Limited  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (E), Mumbai - 400051.  
Symbol: BCG

**Sub: Update on Trade Suspension and Revocation Efforts**

Dear Sir/Madam,

The Board of Directors of Brightcom Group Limited wishes to provide a comprehensive update regarding the ongoing efforts to revoke the suspension of trading in the Company's equity shares. We understand the concerns of our valued stakeholders and assure you that we are committed to full compliance and transparency in addressing this matter.

This communication is being shared with our shareholders through your esteemed platform for their information and reference.

**Compliance Efforts Undertaken**

The Company has diligently worked towards fulfilling all compliance requirements stipulated by the exchanges. Below is a detailed list of actions completed:

**Submission of Shareholding Pattern (SHP):** Shareholding patterns for all pending quarters, including the June and September quarters of 2024, have been uploaded to the exchanges.

**Filing of Financial Results:** The financial results for all outstanding periods have been submitted, ensuring full compliance with SEBI (LODR) Regulations.

**Annual Reports:** The Annual Report for FY2023, along with statutory disclosures, has been filed with the exchanges and shared with shareholders.

**AGM Conducted:** The Annual General Meeting for FY2023 was conducted on November 21, 2024, during which shareholders approved all resolutions, including the adoption of financial results for FY2023.





## SOP Penalties Paid

All SOP penalties levied by the NSE and BSE for compliance delays have been paid in full. A detailed breakdown of compliances met, and the corresponding penalties paid is attached as Annexure 1.

## Relisting Process Overview

The revocation of suspension and relisting process involves the following steps:

**Verification by Exchanges:** The exchanges will verify all submitted documents and filings to ensure compliance.

**Site Visit by Exchanges:** As part of the verification process, the exchanges will conduct a site visit to confirm the Company's operational and regulatory readiness.

**Issuance of Circular:** Upon successful verification, the exchanges will issue a circular notifying the date on which trading in the Company's shares will resume.

**Special Exchange Procedure for Relisting:** Actual relisting will follow a special exchange procedure called the SPOS. Annexure 2 provides detailed information on this process.

## Attachments:

**Annexure 1:** Detailed Table of Compliances Met and Corresponding NSE and BSE SOP Payments Made.

**Annexure 2:** SPOS Process Listing the Exchange Procedure for Relisting.

We remain committed to providing timely updates to all stakeholders and to work closely with NSE and BSE to expedite the relisting process. Thank you for your continued support and patience.

Yours sincerely,

For Brightcom Group Limited

Haghunath Allamsetty  
Executive Director  
DIN: 00060018



**Annexure 1: Detailed Table of Compliances Met and Corresponding NSE & BSE SOP Payments Made.**

Regulation	Quarter/FY	Compliance status	Remarks	Regulation Description	Penalty Paid - BSE	Penalty Paid - NSE
27(2)	30-Sep-24	Compliant		CG Report	₹ 125,080	₹ 125,080
27(2)	30-Jun-24					
27(2)	31-Mar-24					
76	30-Sep-24	Compliant		Share Reconciliation	₹ -	₹ -
76	30-Jun-24					
76	31-Mar-24					
55(A)	30-Sep-24	Compliant		Capital Audit	₹ -	₹ -
55(A)	30-Jun-24					
55(A)	31-Mar-24					
13(3)	30-Sep-24	Compliant		Investor Grievance	₹ 62,540	₹ 62,540
13(3)	30-Jun-24					
13(3)	31-Mar-24					
33	30-Sep-24	Compliant		Financial Results	₹ 1,964,700	₹ 1,964,700
33	30-Jun-24					
33	31-Mar-24					
31(1)	30-Sep-24	Compliant		Shareholding Pattern	₹ 92,040	₹ 92,040
31(1)	30-Jun-24					
31(1)	31-Mar-24					
24(A)	31-Mar-24	Compliant		Secretarial Compliance and Audit	₹ -	₹ -
20	31-Mar-24	Compliant		Stakeholder Relationship Committee	₹ -	₹ 82,600
43 (A)		Compliant		Dividend Distribution Policy	₹ -	₹ 29,500
SDD		Compliant	Will be fully compliant by QE December 31, 2024	Structured Digital Database (Insider Information Related)	₹ -	₹ -
34	31-Mar-23	Compliant	AGM Concluded on 21 <sup>st</sup> November 2024	Annual Report	₹ -	₹ -
40(9), 40(10)	31-Mar-24	Compliant		Share Transfers	₹ -	₹ -





## **Annexure 2: SPOS Process Listing the Exchange Procedure for Relisting.**

The re-listing process is governed by the Special Pre-Opening Session (SPOS) as per the rules and regulations of the stock exchanges. This process ensures an orderly and transparent commencement of trading for re-listed securities. Below is a step-by-step breakdown of the procedure:

### **1. Pre-Opening Session (9:00 AM to 10:00 AM):**

This session is divided into three distinct stages to facilitate order entry, price discovery, and the transition to regular trading. Only limit orders are allowed during the pre-opening session. The stages are as follows:

#### **Stage 1: Order Entry (9:00 AM to 9:45 AM)**

- Investors can place, modify, or cancel their limit orders for the security being re-listed.
- No matching of orders occurs during this period; it is purely for order entry.

#### **Stage 2: Order Matching (9:45 AM to 9:55 AM)**

- Exchanges match the entered limit orders to determine the opening price.
- Price discovery and trade confirmations take place during this period.

#### **Stage 3: Transition to Regular Market (9:55 AM to 10:00 AM)**

- This phase marks the transition from the pre-opening session to the regular trading session.
- The discovered opening price becomes the reference price for the regular market.

### **2. Regular Trading Session (10:00 AM onwards):**

- Begins immediately after the transition period.
- Trading proceeds as per standard exchange rules based on the opening price determined during the pre-opening session.





## Key Details for Re-Listed Securities

### Dynamic Price Bands for Re-Listed Securities:

- Initial dynamic price bands are set in coordination by both exchanges within the range of -85% to +50% of the base price.
- The base price is the last traded price of the security prior to its re-listing.
- Flexibility in Price Bands During Price Discovery:
  - During the price discovery phase, the exchanges may adjust the price bands in increments of 10% based on demand and supply dynamics.
  - Such adjustments are at the exchanges' discretion and aim to ensure a fair and transparent price discovery process.

### Regular Trading Commencement

- Once the pre-opening session concludes, regular trading begins at 10:00 AM based on the price discovered during the pre-opening session. This price serves as the starting point for trading for the rest of the day. This detailed structure ensures an efficient and fair process for the re-listing of securities, balancing market stability with price discovery.

### Re-Listing Process Flowchart

