

# बामर लॉरी इनवेरटमेंटस लिमिटेड (भारत सरकार का एक उद्यम)

### Balmer Lawrie Investments Ltd.

(A Government of India Enterprise)

पंजीकृत कार्यालय: 21, नेताजी सुभाष रोड कोलकाता - 700 001.

फोन : (91) (033) 2222 5227 Regd. Office:

21, Netaji Subhas Road Kolkata - 700 001 Phone : (91)(033) 2222 5227 CIN : L65999WB2001GOI093759

Ref: BLIL/SECY/MARCH2024

Date: 30th May, 2024

The Secretary, **BSE** Limited Phiroze Jeejeebhoy Towers Dalal Street Mumbai- 400001

Scrip Code: 532485

Dear Sir(s)/Madam(s),

Sub: Annual Secretarial Compliance Report for the Financial Year ended on 31st March, 2024

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended), the Annual Secretarial Compliance Report dated 29th May, 2024 of the Company for the Financial Year ended on 31st March, 2024 issued by Ms. Binita Pandey, ACS - 41594, COP - 19730, Partner at M/s. T. Chatterjee & Associates, (FRN: P2007WB067100) Practicing Company Secretaries is attached.

Yours faithfully,

For Balmer Lawrie Investments Limited

Abhishek Lahoti Company Secretary and Compliance Officer

Encl: As above

Page 1 of 1

Website: www.blinv.com E-mail: lahoti.a@balmerlawrie.com

Kolkata Office: "ABHISHEK POINT" 4th Floor, 152, S. P. Mukherjee Road, Kolkata - 700026 Phone: (033) 4060 5149 / 2465 0061 E-mail: tchatterjeeassociates@gmail.com

Delhi Office: 1209, 12th Floor, Ansal Tower, 38 Nehru Place, New Delhi, Delhi - 110019

#### SECRETARIAL COMPLIANCE REPORT OF

### Balmer Lawrie Investments Limited For the financial year ended 31-03-2024

[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,

Balmer Lawrie Investments Limited 21, N.S. Road Kolkata- 700001

We, T. Chatterjee & Associates have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Balmer Lawrie Investments Limited (CIN: L65999WB2001GOI093759)** (hereinafter referred as 'the listed entity'), having its Registered Office at 21, Netaji Subhas Road, Kolkata 700 001, listed on **Scrip Code- 532485**. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2024, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, T. Chatterjee & Associates, have examined:

- (a) all the documents and records made available to us and explanation provided by **Balmer Lawrie Investments Limited**, (hereinafter referred as "the listed entity")
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (c) website of the listed entity,
- (d) books, papers, minute books, reports, statements and documents filed with the recognized stock exchange(s) on the electronic platform, other records maintained by the listed entity and electronics record of the official portal of the Stock Exchange

**for the year ended on 31-03-2024** (herein after referred as the "Review Period") in respect of compliance with the provisions, to the extent applicable to the listed entity of:

- (i) Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (ii) 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, as amended, whose provisions and the circulars/ guidelines issued thereunder, have been examined to the extent applicable to the listed entity, includes: -



- a. Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015;
- b. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;(not applicable to the listed entity during review period);
- c. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d. Securities and Exchange Board of India (Buy-back of Securities) Regulations 2018; (not applicable to the listed entity during review period);
- e. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021(not applicable to the listed entity during review period);
- f. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations 2021 (not applicable to the listed entity during review period);
- g. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and and circular/guidelines issued thereunder;

We have examined the compliance of above regulations, circulars, guidelines issued thereunder as applicable during the review period and based on confirmation received from management of the Company as and whenever required and affirm that

Sr.	Particulars	Compliance	Observations
No.		Status	/ Remarks by
		(Yes/No/NA)	PCS *
1	Secretarial Standards:	Yes	
	The compliances of the listed entity are in		
	accordance with the applicable Secretarial		
	Standards (SS) issued by the Institute of		
	Company Secretaries India (ICSI),		

Sr.	Particulars	<b>Compliance Status</b>	Observations
No.		(Yes/No/NA)	/ Remarks by
		, , ,	PCS *



2	Adoption and timely updation of the Policies:	Yes
	<ul> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> </ul>	
	<ul> <li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	
3	Maintenance and disclosures on Website:	Yes
	The Listed entity is maintaining a functional website	
	Timely dissemination of the documents/ information under a separate section on the website	
	Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website	
4	Disqualification of Director:	Yes
	<ul> <li>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.</li> </ul>	
5	Details related to Subsidiaries of listed	Yes
	entities have been examined w.r.t.:	
	(a) Identification of material subsidiary companies	
	(b) Disclosure requirement of material as well as other subsidiaries	



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS *
6	Preservation of Documents:  The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	
7	Performance Evaluation:  The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	NA	The listed entity being a government company has been exempted from complying with the requirement of performance evaluation vide Notification No. GSR 463(E) dated 5th June, 2015 issued by the Ministry of Corporate Affairs



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remark by PCS *
8	Related Party Transactions:	Yes	
	(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions; or		
	(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	No such instances	
9	Disclosure of events or information:	Yes	
	The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.		



Sr.	Particulars	Compliance Status	Observations/
No.		(Yes/No/NA)	Remarks by PCS *
10	Prohibition of Insider Trading:	Yes	
	The listed entity is in compliance		
	with Regulation 3(5) &3(6) SEBI		
	(Prohibition of Insider Trading)		
	Regulations,2015.		
11	Actions taken by SEBI or Stock	Yes	
	Exchange(s), if any:		
	No action(s) has been taken against		
	the listed entity/its promoters/		
	directors/ subsidiaries either by		
	SEBI		
	or by Stock Exchanges (including		
	under the Standard Operating		
	Procedures issued by SEBI through		
	various circulars) under SEBI		
	Regulations and circulars/guidelines		
	issued thereunder except as		
	provided under separate paragraph		
10	herein (**)		
12	Additional non-compliances, if any:	Yes	
	No additional non-compliance observed for any SEBI		
	J J		
	regulation/circular/guidance note etc.		
	eic.		

<sup>\*</sup>Observations /Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

## Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Partic	culars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS *								
1	Comp	oliances with the following cor	nditions while appoin	ting/re-appointing an								
	audit	auditor										
	i.	If the auditor has resigned	NA	The Company being								
		within 45 days from the end		a Government								
		of a quarter of a financial		Company, the								
		year, the auditor before such		appointment of								
		resignation, has issued the		Statutory Auditors is								
		limited review/ audit report		carried out by								
		for such quarter; or		Comptroller and								
		-		Auditor General of								
	ii.	If the auditor has resigned		India and there was								
		after 45 days from the end of		no event of								



	a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or  iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for		resignation by the Auditors.
	such financial year.		
2	Other conditions relating to resignation	on of statutory auditor	l
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:  a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.	NA	There was no event of resignation of Statutory Auditors of the Listed Entity during the review period or any event where concern with the management of the Company was expressed. The Company does not have a material subsidiary.
	b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information /		

	explanation from the company, the auditor has		
	informed the Audit Committee the details of information / explanation sought and not provided bythe management, as applicable.		
	c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.		
	ii. Disclaimer in case of non-receipt of information:		
	The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.		
3	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	NA	There was no event of resignation of Statutory Auditors of the Listed Entity during the review period. The Company does not have a material subsidiary



#### Further based on the above examinations, 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 the matter specified below:

Sr. Comp No. liance Requi remen t (Regul ations) circula rs/ guidel ines includ ing specifi c clause )		Deviation s	Acti on Take n by	Type of Action Adviso ry/ Clarific ation/ Fine/Sh ow Cause Notice/ Warnin g, etc.	Details of Violation	Fine Amo unt	Observations/ Remarks of the Practicing Company Secretary (Refer Note)	Man- age- ment Re- spons e	Rema rks
Clause Regulation 1 of Regulation 17 of SEBI (Listin g Obligations and Disclo sure Requirement s) Regulations, 2015	(Listi ng Oblig ations and Discl osure Requi reme nts) Regul ations , 2015	Non-Complian ce of the compositi on of the Board of Directors	BSE Limi ted	Fines	The number of Directors on the Board was below the prescribed limit of six Directors during the period 01-04-2023 to 31-03-2024  The Company had no Independent Director on its Board from 01-04-2023 to 31-03-2024.  The Company did not have a Woman Independent Director on the Board	Rs 19,05, 700/- (Inclu sive of GST) (Fine impo sed for quart ers ende d on June, 23, Sep, 23, Dec, 23 and Marc h, 24	The Company being a Governmen t Company, the Compositio n of the Board of Directors is dependent on the direction of the Administrat ive Ministry and thus, the non- compliance was beyond the control of the Company.	The listed entity has applie d for waive r of such fines as the Comp any being a Gover nment Comp any, the Comp ositio n of the Board of Direct	



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	Regula	ng	ce of the	ted		not have any	0/-	being a	entity	
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	tion 17	Oblig	Quorum			Independent	(Inclu	Governmen	has	
	of	ations	of			during the	sive	t Company,	applie	
	SEBI	and	Meeting			review period,	of	the	d for	
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1	2015					) Regulations,	23,	compliance	any,	
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	of	ations	on of the			Director	sive	t Company,	applie
	SEBI	and	Audit			during the	of	the	d for
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	ement	, 2013				line with Clause 18(1)	d on	the Administrat	being
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	s) Regula					of SEBI (LODR)	June, 23,	ive Ministry and	Gover nment	
	tions,					Regulations,	Sep,	thus,the	Comp	
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	tions and Disclo sure Requir ement s) Regula tions, 2015	reme nts) Regul ations , 2015				quorum of Audit Committee was not met as per Regulation 18(2) of SEBI (LODR) Regulations, 2015		Directors is dependent on the direction of the Administrat ive Ministry and thus, the noncompliance was beyond the control of the Company.	the appointment of direct or is not within the control of the company.	
5	Clause 1 and 2 of Regula tion 19 of SEBI (Listin g Obliga tions and Disclo sure Requir ement s) Regula tions, 2015	SEBI (Listi ng Oblig ations and Discl osure Requireme nts) Regulations , 2015	Non-Complian ce of constitution of the Nominati on and Remunera tion Committe e	The BSE Limi ted had impo sed Fines on the Com pany durin g the perio d unde r revie w for such noncom plian ce	Fines	The Board of Director did not have any Independent Director. Accordingly, the Composition of the Nomination and Remuneration Committee was not in line with Regulation 19(1) & 19(2) of SEBI (LODR) Regulations, 2015	Rs 8,63,7 60/- (Inclu sive of GST) (Fine impo sed for quart ers ende d on June, 23, Sep, 23, Dec, 23 and Marc h, 24	The Company being a Governmen t Company, the Compositio n of the Board of Directors is dependent on the direction of the Administrat ive Ministry and thus, the non- compliance was beyond the control of the Company.	The listed entity has applie d for waive r of such fines as the Comp any being a Gover nment Comp any, the Comp ositio n of the Board of Direct ors is depen dent on the directi on of the	



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	and	nts)	was not as			the Meeting of		dependent	appoi	
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	tion 20	Oblig	Constitutio			Independent	(Inclu	Governmen	has	
	of	ations	n of the			Director.	sive	t Company,	applie	
i	SEBI	and	Stakeholde			Accordingly,	of	the	d for	



(Listin g Obliga tions and Disclo sure Requir ement s) Regula tions, 2015	Discl osure Requi reme nts) Regul ations , 2015	rs Relationshi p Committee	the Composition of the Stakeholders Relationship Committee was not in line with Regulation 20(2A) of SEB LODR Regulations, 2015	impo sed for quart ers ende d on	Compositio n of the Board of Directors is dependent on the direction of the Administrat ive Ministry and thus, the non- compliance	waive r of such fines as the Comp any being a Gover nment Comp any,	
				Marc h, 24	Company.	n of the Board of Direct ors is depen dent on the directi on of the Admi nistrat ive Minist ry and thus, the non-compliance was beyon d the contro l of the Company.	

	DOE E	I	
8	BSE Fines	The Stock	Rs
	Limi	Exchange had	6,49,0
	ted	levied fine	00/-
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		per Regulation	ers
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		(LODR)	d on
		Regulations,	June,
		2015 the	23,
		requirement of	Sep,
		having Risk	23,
		Management	Dec,
		Committee is	23
		applicable for	and
		top 1000 listed	Marc
		entities and	h, 24
		since, the	
		Company did	
		not fall in the	
		said category,	
		the	
		requirement	
		was not	
		applicable to	
		the Company.	
		The same had	
		been	
		communicated	
		to the Stock	
		Exchange by	
		the Company	
		through its	
		wavier	
		applications	

# Note: The reply to the representation made to BSE Limited is awaited in respective cases. Further, as per the policy for exemption of fines levied as per the provisions of SEBI SOP Circular, para 3, non-compliance arising out of inability of Company to comply on account of any appointment to BOD/KMP due to pending approval from the Government (Ministry), is included in indicative list of events which may be considered by SEBI for granting waiver or reduction of fine levied under SOP for compliance with LODR.



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

Sr. No	Compliance Requirement (Regulations/circulars/guidelinesincludingspecificclause)	Regu latio n/ Circu lar No.	Devia tions	Action Taken by	Type of Actio n Advis ory/ Clarif icatio n/ Fine/ Show Cause Notic e/ Warni ng, etc.	Details of Violation	Fine Amount	Observati ons/ Remarks of the Practicing Company Secretary	Manage- ment Re- sponse	Remar
	Clause Regulat ion 1 of Regulat ion 17 of SEBI (Listing Obligat ions and Disclos ure Require ments) Regulat ions, 2015	Oblig ation	Non Comp liance of the comp ositio n of the Board of Direct ors	BSE Limited	Fine	The number of Directors on the Board was below the prescribed limit of six Directors during the period 01-04-2022 to 31-03-2023  The Company had no Independen t Director on its Board from 12-07-2022 to 31-03-2023.  The Company did not have a Woman Independen t Director	Rs 21,47,60 0/- (Inclusiv e of GST)	The Company being a Governme nt Company, the Compositio n of the Board of Directors is dependent on the direction of the Administra tive Ministry and thus, the non- complianc e was beyond the control of the Company.	The listed entity has applied for waiver of such fines as the Company being a Governme nt Company, the Compositi on of the Board of Directors is dependent on the direction of the Administrative Ministry and thus, the noncomplianc e was beyond	The Compa ny has brough t the matter to the Notice of the Admini strative Ministr y. The directio ns of the Admini strative is awaite d in this regard



2	Clause 2A of Regulat ion 17 of SEBI (Listing Obligat ions and Disclos ure Require ments) Regulat ions, 2015	SEBI (Listi ng Oblig ation s and Discl osure Requi reme nts) Regul ation s, 2015	Requirement of Quorum of Meeting of the Board of Directors was not met	BSE Limited	Fine	on the Board from 12-07-2022 to 31-03-2023  The Board of Directors did not have any Independen t Director with effect from 12-07-2022 to 31-03-2023, hence, the quorum of Board Meeting was not met as per the Regulation 17(2A) of SEBI (Listing Obligations & Disclosure Requiremen ts) Regulations, 2015	Rs 35,400/- (Inclusiv e of GST)	The Company being a Governme nt Company, the Compositio n of the Board of Directors is dependent on the direction of the Administra tive Ministry and thus, the non- complianc e was beyond the control of the Company	the control of the Company.  The listed entity has applied for waiver of such fines as the Company being a Governme nt Company, the Compositi on of the Board of Directors is dependent on the direction of the Administrative Ministry and thus, the noncompliance was beyond the control of the Company.	ny has brought the matter to the Notice of the Admini strative Ministr y. The directio ns of the Admini
3	Clause 1 of Regulat ion 18 of SEBI (Listing Obligat ions and Disclos	SEBI (Listi ng Oblig ation s and Discl osure Requi reme	Non compliance of compositio n of the Audit Com	BSE Limited	Fine	The Board of Directors comprised of only 1 Independent Director till 11-07-2022 and did not have any Independent Director	Rs 8,61,400 /- (Inclusiv e of GST)	The Company being a Governme nt Company, the Compositio n of the Board of	The listed entity has applied for waiver of such fines as the Company being a Government	The Compa ny has brought the matter to the Notice of the Admini

	11110	nta)	mittoo			from 12.07		Dinastana	Company	atrativo
	ure	nts)	mittee			from 12-07-		Directors	Company,	strative
	Require	Regul				2022 to 31-		is	the	Ministr
	ments)	ation				03-2023,		dependent	Compositi	y. The
	Regulat	S,				hence, the		on the	on of the	directio
	ions,	2015				number of		direction	Board of	ns of
	2015					Independent		of the	Directors	the
						Director in		Administra	is	Admini
						the Audit		tive	dependent	
						Committee		Ministry	on the	is
						was below		and thus,	direction	awaited
						2/3rd (two-		the non-	of the	in this
						third) of the		complianc	Administr	regard.
						total		e was	ative	
						members of		beyond the	Ministry	
						Audit		control of	and thus,	
						Committee		the	the non-	
						from 01-04-		Company.	complianc	
						2023 to 31-			e was	
						03-2023.			beyond	
									the control	
						The			of the	
						Chairperson			Company.	
						of the Audit			company.	
						Committee				
						was not an				
						Independent				
						Director from				
						12-07-2022				
						till 31-03-				
						2023				
4	Clause	SEBI	Non-	-	-	The Board	-	The	The	The
	2 of	(Listi	compli			of Directors		Company	Company	Compa
	Regulat	ng	ance			comprised		being a	being a	ny has
	ion 18	Oblig	of			of only 1		Governme	Governme	brought
1	of SEBI	ation	quoru			Independent		nt	nt	the
1	(Listing	s and	m of			Director till		Company,	Company,	matter
	Obligat	Discl	the			11-07-2022		the	the	to the
1	ions	osure	Audit			and the		Compositio	appointme	Notice
	and	Requi	Commi			Board of		n of the	nt of	of the
	Disclos	reme	ttee			Directors		Board of	director is	Admini
	ure	nts)				did not have		Directors	not within	
	Require	Regul				any		is	the control	
	ments)	ation				Independent		dependent	of the	y. The
	Regulat	s,				Director		on the	company.	directio
	ions,	2015				from 12-07-		direction	1 5	ns of
	2015	_				2022, hence,		of the		the
						the		oj ine Administra		Admini
						requirement		Auminisira tive		strative
						of quorum				is
						of Audit		Ministry		awaited
						-		and thus,		awaneu

						Committee was not met at the Meeting of Audit Committee held from 01-04-2022 to 31-03- 2023		the non-complianc e was beyond the control of the Company.		in this regard.
5	Clause 1 and 2 of Regulat ion 19 of SEBI (Listing Obligat ions and Disclos ure Require ments) Regulat ions, 2015	SEBI (Listi ng Oblig ation s and Discl osure Requireme nts) Regul ation s, 2015	Non Compliance of constit ution of the Nomin ation and Remun eration Committee	BSE Limited	Fine	The Board of Director did not have any Independent Director from 12-07-2022, hence, the number of Independent Director in the NRC Committee was below 2/3rd (two-third) of the total members of NRC Committee from 01-04-2022 to 31-03-2023.  The chairperson of the Committee was not an Independent Director 12-07-2022 till 31-03-2023	Rs 8,61,400 /- (Inclusiv e of GST)	The Company being a Governme nt Company, the Compositio n of the Board of Directors is dependent on the direction of the Administra tive Ministry and thus, the non- complianc e was beyond the control of the Company.	The listed entity has applied for waiver of such fines as the Company being a Governme nt Compositi on of the Board of Directors is dependent on the direction of the Administrative Ministry and thus, the noncomplianc e was beyond the control of the Company.	The Compa ny has brought the matter to the Notice of the Admini strative Ministr y. The directio ns of the Admini strative is awaited in this regard.
6	Clause 2A of Regulat ion 19 of SEBI (Listing	ng	Non-compliance of Quoru m of	-	-	The Board of Directors does not have any Independent Director	-	The Company being a Governme nt Company,	The Company being a Governme nt Company,	The Compa ny has brought the matter



7	Obligat ions and Disclos ure Require ments) Regulat ions, 2015	Discl osure Requi reme nts) Regul ation s, 2015	the Nomi nation and Remu nerati on Com mittee was not as met	DOE	Time.	from 12-07- 2022 to 31- 03-2023, hence, the requirement of quorum of NRC Committee was not met at the Meeting of NRC during the FY 2022- 23	D-	the Compositio n of the Board of Directors is dependent on the direction of the Administra tive Ministry and thus, the non- complianc e was beyond the control of the Company.	the appointme nt of director is not within the control of the company.	to the Notice of the Admini strative Ministr y. The directions of the Admini strative is awaited in this regard.
7	Clause 2A of Regulat ion 20 of SEBI (Listing Obligat ions and Disclos ure Require ments) Regulat ions, 2015	ation s and Discl osure Requi reme nts)	Non-Comp liance pf Constitution of the Stake holder s Relationshi p Committee	BSE Limited	Fine	The Board of Directors did not have any Independent Director from 12-07-2022, hence, the Stakeholder s Relationship Committee did not have any Independent Director from 12-07-2022 to 31-03-2023.	Rs 4,29,520 /- (Inclusiv e of GST)	The Company being a Governme nt Company, the Compositio n of the Board of Directors is dependent on the direction of the Administra tive Ministry and thus, the non- complianc e was beyond the control of the Company.	The listed entity has applied for waiver of such fines as the Company being a Governme nt Company, the Compositi on of the Board of Directors is dependent on the direction of the Administrative Ministry and thus, the noncomplianc	ns of the Admini strative

				e was beyond the control of the Company.	

Place: Kolkata

Date: 29/05/2024

For M/s T.Chatterjee& Associates Practising Company Secretaries FRN No. - P2007WB067100

Binita Pandey - Partner ACS: 41594, CP: 19730 UDIN: A041594F000489470 Peer Review No.: 908/2020

