

The Deputy General Manager
The Bombay Stock Exchange Ltd
P. J. Towers, 25th Floor
Dalal Street,
Mumbai-400001

Date: 06-07-2020

Dear Sir,

Re: Script Code: 520127

SUB: Annual Secretarial Compliance Report for the year ended March 31, 2020

Pursuant to SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 8, 2019 please find enclosed the Annual Secretarial Compliance Report of the Company for the Financial Year March 31, 2020 issued by Kanchan Maheswari, Company Secretary.

This is for your information & records.

Thanking You,

For Balurghat Technologies Ltd

Arti Dugar
(Arti Dugar)
Company Secretary
ACS: 55175





**Secretarial Compliance Report of M/s Balurghat Technologies Limited for
the year ended 31st March, 2020**

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
The Members of
Balurghat Technologies Limited
170/2C, A.J.C. Bose Road
Kolkata-700014

CIN: L60210WB1993PLC059296
Authorised Capital: Rs. 3,00,000,000/-

I have conducted the Secretarial Compliance Audit of the applicable SEBI (Securities and Exchange Board of India) Regulations and the circulars/ guidelines issued thereunder for the Financial Year ended 31st March 2020 for M/s BALURGHAT TECHNOLOGIES LTD (“the Company”). The audit was conducted in a manner that provided me a reasonable basis for evaluating the statutory compliances and expressing my opinion thereon.

I have examined:

- (a) all the documents and records made available to me and explanation provided by M/s Balurghat Technologies 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, 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Any other regulations, circulars etc. issued by SEBI applicable to the Company.

And circulars/ guidelines issued thereunder;

and based on the above examination, I 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, However regulations mentioned above under clause (b), (d), (e), (f) and (g) are not applicable to the company during the review period; except in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations/ guidelines specific clause)	Requirements circulars / including	Deviations	Observations/ Remarks of the Practicing Company Secretary
Not Applicable				

- (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.	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.
Not Applicable				

(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
Not Applicable				

Note: Due to COVID19 pandemic impact, the compliance documents for the year April 2019 to March 2020 were obtained through electronic mode and verified with requirements.

Place: Kolkata	Signature : KANCHAN MAHESWARI <small>Digitally signed by KANCHAN MAHESWARI Date: 2020.07.06 11:59:37 +05'30'</small> Name of the Company Secretary :KANCHAN MAHESWARI
Date : 06.07.2020	ACS Number : 55837 CP Number : 20877
UDIN - A055837B000417132	