

# **BSEL INFRASTRUCTURE REALTY LIMITED**

CIN : L99999MH1995PLC094498

Regd. Office : 737, 7th Floor, The Bombay Oilseeds & Oils Exchange Premises Co-op. Soc. Ltd.,  
The Commodity Exchange, Plot No. 2,3 & 4, Sector-19-A, Vashi, Navi Mumbai-400 705.  
Tel. : +91-22-6512 3124, Tele fax : +91 22 2784 4401, website : www. bsel.com



Date: 30<sup>th</sup> June, 2020

To, <b>BSE Limited</b> Listing Department, Phiroze Jeejeebhoy Towers Dalal Street; Fort Mumbai 400 001 Script Code: 532123 ISIN: INE395A01016	<b>National Stock Exchange of India Ltd.</b> Exchange Plaza, 5th Floor Plot No. C/1, G Block; Bandra (East) Mumbai 400 051  Symbol: BSELINFRA ISIN: INE395A01016
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Dear Sir/Madam,

**Subject: - Submission of Annual Secretarial Compliance Report for year ended 31st March 2020 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements), 2015.**

With reference to the above, please find enclosed herewith the copy of the Annual Secretarial Compliance Report for year ended 31st March 2020 issued by Sunita Dube & Associates, Practicing Company Secretary pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements), 2015.

This is for your information and record.

Kindly take the above on record and oblige.

Yours truly,

**For BSEL Infrastructure Realty Limited**

*Alpa Hakani*



**Alpa Hakani**  
**Company Secretary & Compliance Officer**

Encl: a/a



# Sunita Dube & Associates

Office Address: 2, Ground Floor, New Bhushan Apartment, Near Sai Pranay Hotel, Surviewadi Teen Hath Naka Thane West-400604: (M) +919967790055(O)+918433777606 E-mail: [cssunitadube@gmail.com](mailto:cssunitadube@gmail.com)

## **Secretarial Compliance Report of BSEL Infrastructure Realty Limited** **(L99999MH1995PLC094498)**

**For the Financial Year Ended 31<sup>st</sup> March, 2020**

**To**

**Board of Directors**

**BSEL Infrastructure Realty Limited**

737,7th Floor, The Bombay Oil Seeds & Oil

Ex. Premises Co-op Soc. Ltd. Commodity

Ex. Sector-19, PL 2,3&4, Vashi Navi Mumbai 400705

I have examined:

- (a) all the documents and records made available to us and explanation provided by **BSEL INFRASTRUCTURE REALTY 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<sup>st</sup> 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 **(there were no events requiring compliance during the Review Period)**;
- (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 **(there were no events requiring compliance during the Review Period)**;
- (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 **(there were no events requiring compliance during the Review Period)**;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(there were no events requiring compliance during the Review Period)**;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulation”);  
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, **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.	<b>Regulation 27(2)(a) of LODR- Corporate Governance Report</b> Within 15 days from the end of the quarter	There was delay in filing Corporate Governance Report for the quarter ended 30 <sup>th</sup> September, 2019 to Stock Exchange.	Company has filed Corporate Report on 23.10.2019
2.	<b>Regulation 34 of LODR</b> Within 21 working days of being approved and adopted in AGM	There was delay of Two days in submitting Annual Report to Stock Exchange	Company has paid fine for the delay

- (b) The listed entity has prima facie maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my 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.
1.	NSE	Regulation 6 (1)	Fine	Fine has been paid by Company on 23.08.2019
2.	NSE	Regulation 19(1)/19(2)	Fine	
3.	NSE	Regulation 29(2)/29(3)	Fine	
4.	NSE	Regulation 33	Fine	Paid on 29.09.2019
5.	NSE	Regulation 34	Fine	Paid on 16.10.2019
6.	NSE	Regulation 19(1)(2)	Fine	Paid on 16.11.2019
7.	NSE	Regulation 6 (1)	Fine	

8.	BSE	Regulation 19(1)/19(2)	Fine	Paid on 29.08.2019
9.	BSE	Regulation 6 (1)	Fine	Paid on 21.09.2019
10.	BSE	Regulation 33	Fine	
11.	BSE	Regulation 19(1)/19(2)	Fine	
12.	BSE	Regulation 29(2)/29(3)	Fine	
13.	BSE	Regulation 34	Fine	16.10.2019
14.	BSE	Regulation 19(1)(2)	Fine	08.11.2019
15.	BSE	Regulation 6(1)	Fine	16.11.2019
16.	NSE	Action initiated for Freezing of promoter's holdings for non-compliance with listing regulations	Trading Account of Promoters were unfreezed	Trading accounts of Promoters were Unfrozen after payment of fine on 23.08.2019 and 29.08.2019

(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... (The years are to be mentioned)	Actions taken by the Company, if any	Comments of the Practicing Company Secretary on the actions taken by the Company
1.	The Company has failed to appoint Company Secretary	2018-19	Company has appointed whole time Company Secretary and Compliance Officer on 27.08.2019	Company has complied with the provision of appointment of whole time Company Secretary and Compliance officer

**For**  
**Sunita Dube & Associates,**  
**Practicing Company Secretary**

**Sunita** Digitally signed  
**Dube** by Sunita Dube  
Date: 2020.06.30  
15:54:31 +05'30'

CS Sunita Dube  
ACS No.48556  
COP No.17708  
**UDIN: A048556B000402316**

Place: Thane  
Date: 30<sup>th</sup> June, 2020