



# BAZEL INTERNATIONAL LTD.

Regd. Off.: D-50E, Second Floor, Chattarpur Enclave, New Delhi-110 074, Ph. No.: 011-69999159

E-mail: [bazelinternational@gmail.com](mailto:bazelinternational@gmail.com) Website: [www.bazelinternationaltd.com](http://www.bazelinternationaltd.com) CIN: L65923DL1982PLC290287

28<sup>th</sup> July, 2020

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

To,  
**The Executive Director,  
The Calcutta Stock Exchange Limited,  
7, Lyons Range, Kolkata- 700 001  
(Scrip Code: 12149)**

## **SUB: Annual Secretarial Compliance Report for the Financial Year 2019-20**

Dear Sir/Madam,

Pursuant to SEBI vide its circular No. CIR/CFD/CMD 1/27/2019 dated 08<sup>th</sup> February 2019, and relaxation granted by SEBI vide its circular No. SEBI/HO/CFD/CMD 1/CIR/P/2020/109 dated 25<sup>th</sup> June 2020; please find enclosed herewith the Annual Secretarial Compliance Report dated 28<sup>th</sup> July, 2020 for the Financial Year 2019-20 issued by the Practicing Company Secretary.

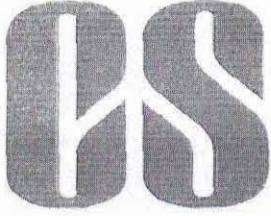
Kindly take the above information on record.

Thanking you,  
Yours faithfully,  
**For Bazel International Ltd.**



Pankaj Dawar  
**(Managing Director)**  
DIN: 06479649  
Regd Address: D-50E, Second Floor,  
Chattarpur Enclave,  
New Delhi-110 074

***Encl: As mentioned above***



**SONAL JAIN & ASSOCIATES**  
**COMPANY SECRETARIES**

Email id: [jain.sonal1488@gmail.com](mailto:jain.sonal1488@gmail.com)  
Registered Office: 39A, Bharat Nagar,  
New Friends Colony, New Delhi-110025  
Mob No: 9953080040  
GSTIN NO. 07AZJPJ9558L1ZK

**ANNUAL SECRETARIAL COMPLIANCE REPORT**  
**OF**  
**BAZEL INTERNATIONAL LIMITED**  
For the Financial year ended on 31<sup>st</sup> March, 2020

[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: D-50 E, 2nd floor, Chattarpur Enclave  
New Delhi - 110074

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,

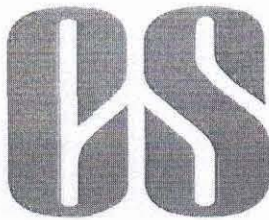
for the year ended 31<sup>st</sup> March, 2020 ("Review Period") in respect of compliance with the provisions of:

- (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 - **Not Applicable.**





## SONAL JAIN & ASSOCIATES COMPANY SECRETARIES

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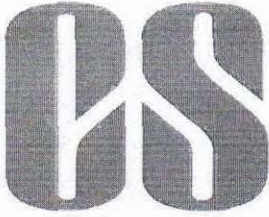
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **Not Applicable.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 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 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.	As per regulation 14 of SEBI (LODR) Regulation, 2015: -  The listed entity shall pay all such fees or charges, as applicable, to the recognized stock exchange (s), in the manner specified by the Board or the recognized stock exchange (s)	The company made the payment to the recognized stock exchange after due date as specified under the regulation.	The company made the payment for the Financial year 2019-2020 on 01.08.2019





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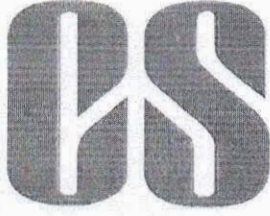
2.	<p>As per clause 4 of Schedule B of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 :-</p> <p>The listed entity shall close the trading window from the end of every quarter till 48 hours after the declaration of financial results.</p> <p>Further, the intimation for closing the trading window shall be given promptly</p>	<p>Although, the company has closed the trading w.e.f 1<sup>st</sup> October,2019 till 48 hours after declaration of financial results of the company for the quarter ended 30<sup>th</sup> September,2019.</p> <p>However, the intimation to the stock exchange was given on 15<sup>th</sup> October,2019.</p>	<p>The company has given the intimation for closure of the trading window on 15<sup>th</sup> October,2019 for quarter ended 30<sup>th</sup> September,2019.</p>
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- (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





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Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 2018 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	<p><b>As per Regulation 34 (1) of the SEBI (LODR) Regulation, 2015:</b></p> <p>The company is required to submit the Annual Report by 20.08.2018, however the company filed on 27.08.2018 for which BSE levied a penalty of Rs. 16,520/- on the company which is still pending for payment on part of the Company.</p>	<p>The payment has been made by the company vide cheque No. "000869" dated 12.06.2019</p>		<p>The pending payment of Rs. 16,520/- has been made to the stock exchange.</p>

For Sonal Jain & Associates  
Company Secretaries

  
Sonal Jain  
Proprietor  
Membership No: 34393  
COP No: 13242  
UDIN: A034393B000516490



Place: New Delhi  
Date: 28.07.2020