



B. P. CAPITAL LIMITED

CIN NO. : L74899HR2094PLC072042

REGD.OFFICE: Plot No- 138, Roz-Ka-MeolIndustrial Area,
Sohna (Distt. Mewat), Haryana-122103

Phones: 0124-2362471

Email : bpcapitallimited@gmail.com, Website : www.bpcapital.in

Dated: 30/05/2024

To,
The Manager (Listing)
Bombay Stock Exchange Limited,
01st Floor, P. J. Towers,
Dalal Street, Mumbai – 400001

Sub: Reply to the BSE's communication dated 23-05-2024 regarding non-submission made by the company relating to Structured Digital Database (SDD) Compliance Certificate for the quarter ending 31st March, 2024

Ref: BSE Scrip Code- 536965

Dear Sir,

This letter is in reference to the communication sent by the Exchange at BSE's listing portal on 23-05-2024 w.r.t. non-submission of Structured Digital Database (SDD) Compliance Certificate for the quarter ending 31st March, 2024 by our company.

In this regard, we wish to inform you that the Board of Directors of the company in its meeting held on 29.05.2024 considered and took note of the aforesaid communication sent by the Bombay Stock Exchange (BSE) at BSE's listing portal on 23-05-2024. The Board also noted that the company has the Structured Digital Database software "THE PIT ARCHIEVE" in place since 16th November 2022 and regular entries are being made on the said software as per the provisions of Regulation 3(5) and/or Regulation 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015. The Board was of the opinion that the Company has duly complied with the Regulation 3(5) and/or Regulation 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 in true letter and spirit.

At the outset, we most humbly submit that ours is a compliant company and has been regularly, within the prescribed time, submitting the various certificates, reports, intimation, etc., to the Exchange.

As regards, maintaining a Structured Digital Database Software as per the requirements of Reg. 3(5) and/or Reg. 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 is concerned, please be informed that the Structured Digital Database software for our company is in place since 16th November 2022 and regular entries are being made on the said software. Some of the reports downloaded from the software are enclosed herewith as **Annexure-A** for your ready reference and records.

It is important to mention here that our company has purchased and installed the SDD software "THE PIT ARCHIEVE" from ORION LEGAL SUPPLIES on 16/11/2022 vide Buyer's Order No. PIT/OLS/2.0/BSE-536965. The company has also got the said Software renewed & updated from ORION LEGAL SUPPLIES

w.e.f 16/11/2023. Copies of the bills received from ORION LEGAL SUPPLIES in this regard & a screenshot of the home page of the "THE PIT ARCHIEVE" software installed by the company are enclosed herewith for your kind perusal as **Annexure -B.**

We further wish to inform you that our company has duly submitted, to the Exchange, the Annual Secretarial Compliance Report for the F.Y.s 2022-23 & 2023-24 from the Practicing Company Secretary wherein it is clearly mentioned that our Company has duly complied with the requirements of Structural Digital Data Base in terms of Securities & Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 including various Circulars / Notifications issued by SEBI & BSE from time to time. A copy of the Annual Secretarial Compliance Report for the F.Y.s 2022-23 & 2023-24 duly submitted with Exchange alongwith the Acknowledgement thereof is enclosed herewith for your kind perusal as **Annexure- C.**

We further wish to submit that as per our understanding of BSE's Notice No. 20230329-21 dated 29 March, 2023, companies that are not required to submit the Annual Secretarial Compliance Report as per the requirements of Regulation 24A of SEBI (LODR) Regulations, 2015, are required to submit SDD Compliance certificate on quarterly basis, within 21 days from end of each quarter. Since our company has duly submitted the Annual Secretarial Compliance Report for the F.Y. ended 31st March, 2023, we understood that we were not required to submit the SDD Compliance certificate after the issuance of BSE's Notice No. 20230329-21 dated 29 March, 2023.

It is further pertinent to mention here that our company was duly submitting the SDD Compliance certificate before the issuance of the present BSE's notice No. 20230329-21 dated 29 March, 2023, i.e., until the quarter ended 31st December, 2022. However, following the release of the said circular and based on our interpretation of the said circular, we believed that we were not required to submit the quarterly SDD Compliance certificate to BSE since our company submits the Annual Secretarial Compliance Report as per Regulation 24A of SEBI (LODR) Regulations, 2015.

As submitted hereinabove, though we are not required to submit Structured Digital Database (SDD) Compliance Certificate every quarter yet and as required, by your good office, we are enclosing herewith the quarterly SDD Compliance certificate for the quarter ended 31st March, 2023, 30th June, 2023, 30th September, 2023, 31st December, 2023 & 31st March, 2024 for your ready reference & records as **Annexure -D.**

We further wish to submit that the non-submission of Structured Digital Database (SDD) Compliance Certificate was neither deliberate nor intentional but due to the understanding of the Circulars / Notifications of SEBI / Exchange, hence we request you to kindly condone the same. We assure you that such mistake will not be repeated in future.

We further reiterate that our company is duly maintaining the Structural Digital Data Base Software "THE PIT ARCHIEVE" and has duly complied with the requirements of Structural Digital Data Base in terms of Reg. 3(5) and/or Reg. 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

We hereby request you to take the aforesaid submissions on record and further request you not to display the name of the Company as "non-compliant with SDD" and also to remove the name of the Compliance Officer under the "Get Quote" page of the Exchange's Website of the Company.

We hope that we have clarified the matter to your satisfaction and shall be pleased to provide any further information or clarification should you require any.

Thanking You.

**Yours Truly,
For B. P. Capital Limited**

SAKSHI GUPTA Digitally signed by SAKSHI
GUPTA
Date: 2024.05.30 10:49:48
+05'30'

**Sakshi Gupta
Company Secretary**

Encl: As Above

UPSI ID	Recipient Name & ID	Recipient PAN No Or Any Other Identifier No.	Informant Name & ID	Informant PAN No Or Any Other Identifier No.	Nature of UPSI	Purpose of Sharing	Date and Time of Sharing	Sharing Till	Mode of Sharing	Medium of Sharing	Remarks	Whether NDA has been signed or Notice of confidentiality has been given?	Date of first entry with User Name	Last Modified Date & Time Entry with Username	Date and Time when UPSI became publicly available
UPSI1	Nemani Garg Aggarwal & Co., Chartered Accountant - DP10,	AACFS 1243B,	ShatrughanSahu-DP5,	BAQPS 1603E,	Un-audited Financial Results of the Company for quarter ended 31st December, 2022	To obtain the Limited Review Report on Un-audited Financial Results of the Company for quarter ended 31st December, 2022	2023-02-01 00:00:00	2023-02-14 00:00:00				YES	2023-02-01 15:50:28 PM - COMPLIANCE OFFICER		

UPS12	Aditya Aggarwal - DP1, KUNDAN AGRAWAL AND ASSOCIATES - DP2, MADHU SHARMA - DP3, Rachit Garg - DP4, Shatrughan Sahu - DP5, Ramesh Kumar Gupta - DP7, Neman Garg Aggarwal & Co., Chartered Accountant - DP10, Sanghi & Co., Chartered Accountant - DP11,	BJYPA0236L, AOTPA1900J, BSYPS5514G, AZSPG7226K, BAQPS1603E, AAJPG5714G, AACFS1243B, AABPS4518A,	Sakshi Gupta - DP6,	BARPG0230N,	Notice of Board Meeting is scheduled to be held on Tuesday 14th February, 2023 at 11:00 A.M	Board Meeting to consider the Un-audited Financial Results of the Company for quarter ended 31st December, 2022	2023-02-01 00:00:00	2023-02-14 00:00:00				YES	2023-02-01 15:53:50 PM - COMPLIANCE OFFICER		
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UPS13	Aditya Aggarwal - DP1, KUNDAN AGRAWAL AND ASSOCIATES - DP2, MADHU SHARMA - DP3, Rachit Garg - DP4, Shatrughan Sahu - DP5, Neman Garg Aggarwal & Co., Chartered Accountant - DP10, Sanghi & Co., Chartered Accountant - DP11,	BJYPA0236L, AOTPA1900J, BSYPS5514G, AZSPG7226K, BAQPS1603E, AACFS1243B, ABPS4518A,	Sakshi Gupta - DP6,	BARPG0230N,	NOTICE OF BOARD MEETING TO BE SCHEDULED ON 29 MAY 2023 AT 11 AM	BOARD MEETING TO CONSIDER FOR AUDITED FINANCIAL RESULTS FOR THE YEAR ENDED MARCH 31, 2023	2023-05-16 17:30:10	2023-05-29 17:30:10	By Electronically	Email		YES	2023-05-16 17:33:52 PM - COMPLIANCE OFFICER	2023-05-29 17:30:10
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UPSI4	Nemani Garg Aggarwal & Co., Chartered Accountant - DP10, Sanghi & Co., Chartered Accountant - DP11,	AACFS 1243B, AABPS 4518A,	ShatrughanSahu-DP5,	BAQPS 1603E,	Financial information and accounting records for the period between 01.04.2022 to 31.03.2023	To carry out audit by auditor for the purpose of declaration of financial results for period ended MARCH 31, 2023	2023-05-16 17:34:03	2023-05-29 17:34:03	By Orally, Documentarily and Electronically	Papers, Email		YES	2023-05-16 17:35:55 PM - COMPLIANCE OFFICER		
UPSI5	Nemani Garg Aggarwal & Co., Chartered Accountant - DP10, Sanghi & Co., Chartered Accountant - DP11,	AACFS 1243B, AABPS 4518A,	ShatrughanSahu-DP5,	BAQPS 1603E,	Financial information and accounting records for the period between 01st april, 2023 to 30th June, 2023	To carry out audit by auditor for the purpose of declaration of financial results for the quarter ended 30th June, 2023	2023-08-03 15:36:28	2023-08-12 15:36:28	By Orally, Documentarily and Electronically	In Person, Papers, Email, Telephonically		YES	2023-08-03 15:41:55 PM - COMPLIANCE OFFICER		2023-08-12 15:36:28

UPS16	Aditya Aggarwal - DP1, KUNDAN AGRAWAL AND ASSOCIATES - DP2, MADHU SHARMA - DP3, Rachit Garg - DP4, Shatrughan Sahu - DP5, Neman Garg Aggarwal & Co., Chartered Accountant - DP10, Sanghi & Co., Chartered Accountant - DP11, Jaysharma - DP12,	BJYPA0236L, AOTPA1900J, BSYPS5514G, AZSPG7226K, BAQPS1603E, AACFS1243B, AABPS4518A, APDPS0032C,	Sakshi Gupta - DP6,	BARPG0230N,	Notice of Board Meeting scheduled to be held on Saturday, 12 August, 2023	To consider the unaudited financial results for the quarter ended 30th June, 2023	2023-08-03 15:56:27	2023-08-12 15:56:27	By Electronically	Email		YES	2023-08-03 15:59:59 PM - COMPLIANCE OFFICER	2023-08-12 15:56:27
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UPS17	Aditya Aggarwal - DP1, KUNDAN AGRAWAL AND ASSOCIATES-DP2, MADHU SHARMA-DP3, Rachit Garg - DP4, Sakshi Gupta - DP6, Neman Garg Aggarwal & Co., Chartered Accountant - DP10, Sanghi & Co., Chartered Accountant - DP11, Jay sharma-DP12,	BJYPA0236L, AOTPA1900J, BSYPS5514G, AZSPG7226K, B ARPG0230N, A ACFS1243B, A ABPS4518A, A PDPS0032C,	ShatrughanSahu-DP5,	BAQPS1603E,	Financial information and accounting records for the period between from 01-07-2023 to 30-09-2023	To carry out audit by auditor for the purpose of declaration of financial results for period ended 30-09-2023	2023-10-30 16:34:25	2023-11-09 16:34:25	By Orally, Documentarily and Electronically	In Person, Documentarily, Papers, Telephonically, Email		YES	2023-10-30 16:42:03 PM - COMPLIANCE OFFICER	2023-11-09 16:34:25
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UPSI8	Aditya Aggarwal - DP1, KUNDAN AGRAWAL AND ASSOCIATES- DP2, MADHU SHARMA- DP3, Rachit Garg - DP4, Shatrughan Sahu- DP5, SYMBOLIC INFRA MART PRIVATE LIMITED- DP8, Neman Garg Aggarwal & Co., Chartered Accountant - DP10, Sanghi & Co., Chartered Accountant -	BJYPA0236L, AOTPA1900J, BSYPS5514G, AZSPG7226K, BAQPS1603E, AVCS5094G, AACFS1243B, ABPS4518A, APDPS0032C,	Sakshi Gupta - DP6,	BARPG0230N,	Notice of Board Meeting Scheduled on 09-11-2023	To consider the unaudited financial results for the quarter and half year ended 30-09-2023	2023-10-30 16:42:09	2023-11-09 16:42:09	By Orally and Electronically	Email, Papers, In Person		YES	2023-10-30 16:50:02 PM - COMPLIANCE OFFICER	2023-11-09 16:42:09
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	DP11,ajay sharma-DP12,														
UPSI9	Nemani Garg Aggarwal & Co., Chartered Accountant - DP10,Sanghi & Co., Chartered Accountant - DP11,	AACFS 1243B, AABPS 4518A,	ShatrughanSahu-DP5,	BAQPS 1603E,	TO CONSIDER THE UN-AUDITED FINANCIAL RESULTS OF THE COMPANY FOR THE QUARTER ENDED 31.12.2023	TO OBTAIN THE UNAUDITED FINANCIAL RESULTS FOR THE QUARTER ENDED 31.12.2023	2024-02-02 15:04:29	2024-02-12 15:04:29	By Orally, Documentarily and Electronically	In Person, Documentarily, Telephonically, Email		YES	2024-02-02 15:08:32 PM - COMPLIANCE OFFICER		

UPSI10	Aditya Aggarwal - DP1, KUNDAN AGRAWAL AND ASSOCIATES - DP2, MADHU SHARMA - DP3, Rachit Garg - DP4, Shatrughan Sahu - DP5, Neman Garg Aggarwal & Co., Chartered Accountant - DP10, Sanghi & Co., Chartered Accountant - DP11, Jaysharma - DP12,	BJYPA0236L, AOTPA1900J, BSYPS5514G, AZSPG7226K, BAQPS1603E, AACFS1243B, ABPS4518A, APDPS0032C,	Sakshi Gupta - DP6,	BARPG0230N,	NOTICE OF BOARD MEETING SCHEDULED TO BE HELD ON 12.02.2024	BOARD MEETING TO APPROVE THE UN-AUDITED FINANCIAL RESULTS OF THE COMPANY FOR QUARTER ENDED 31.12.2023	2024-02-02 15:08:41	2024-02-12 15:08:41	By Electronically	Email		YES	2024-02-02 15:13:51 PM - COMPLIANCE OFFICER		
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UPSI11	Nemani Garg Aggarwal & Co., Chartered Accountant - DP10, Sanghi & Co., Chartered Accountant - DP11,	AACFS 1243B, AABPS 4518A,	ShatrughanSahu-DP5,	BAQPS 1603E,	Financial information and accounting records for the quarter and year ended 31.03.2024	To carry out audit by auditor for the purpose of declaration of financial results for period ended 31.03.2024	2024-05-23 16:23:40	2024-05-29 16:23:40	By Orally, Documentarily and Electronically	In Person, Documentarily, Papers, Telephonically, Email		YES	2024-05-14 16:28:34 PM - COMPLIANCE OFFICER	2024-05-29 16:23:40
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UPSI12	Aditya Aggarwal - DP1, KUNDAN AGRAWAL AND ASSOCIATES-DP2, MADHU SHARMA-DP3, Rachit Garg - DP4, Shatrughan Sahu-DP5, Neman Garg Aggarwal & Co., Chartered Accountant - DP10, Sanghi & Co., Chartered Accountant - DP11, Jaysharma-DP12,	BJYPA0236L, AOTPA1900J, BSYPS5514G, AZSPG7226K, BAQPS1603E, AACFS1243B, ABPS4518A, APDPS0032C,	Sakshi Gupta - DP6,	BARPG0230N,	Notice of Board Meeting scheduled to be held on 29.05.2024 at 11 A.M.	Board Meeting to consider the Audited Financial Results for the quarter and year ended 31st March, 2024	2024-05-14 16:28:54	2024-05-29 16:28:54	By Electronically	Email		YES	2024-05-14 16:35:57 PM - COMPLIANCE OFFICER	2024-05-29 16:28:54
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Orion Legal Supplies

510, Safa Centre, Near Mangaldas Market, Zaveri Bazaar, Mumbai - 400 002

Email ID: contact@orionlegalsupplies.in | Website: www.orionlegalsupplies.in | Contact: 91586 39996

TAX INVOICE

Buyer Name: B P CAPITAL LIMITED Billing Address: 7th, 702, Arunachal Building, 19, Barakhamba Road, Connaught Place, New Delhi - 110 001 State Code: 07 GSTIN of Buyer: 07AAACB0417B1ZK	Shipping Address: 7th, 702, Arunachal Building, 19, Barakhamba Road, Connaught Place, New Delhi - 110 001 State Code: 7 Bill Type: Original Bill
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Buyer's Order No.	Dated (M-D-YYYY)	Invoice No.	Dated (M-D-YYYY)
PIT/OLS/2.1/BSE-536965	2/1/2024	GST/1484/2023-24	2/1/2024
Dispatch Document No.	Delivery Note Date	Delivery Note	Mode/Terms of Payment
-	-	-	Banking
Dispatched through	Destination	Supplier's Ref.	Other Reference(s)
Online	New Delhi	-	-
Buyer Type: Corporate	Payment Due Date: Within 7 days of receipt		
Place of Supply: New Delhi	Place of Delivery: New Delhi		

Sl. No.	Description of Goods / Services	HSN/SAC	Qty	Rate	Amount
1	Second Year Licence Fees for THE PIT Archive - Structured Digital Database Software (16.11.2023 - 15.11.2024)	SAC-997331	1	3000	3000
TAXABLE VALUE					3000
GST @ 18%					
				CGST @ 0%	0
				SGST @ 0%	0
				IGST @ 18%	540
TOTAL					3540

Amount in Words: Rupees Three Thousand Five Hundred Forty Only

Declaration: <ul style="list-style-type: none">We declare that this tax invoice shows the actual price of the goods/services described and that all particulars are true and correct.We declare that there is no tax payable under reverse charge mechanism. GSTIN NO: 27AAJHV3364H1ZR PAN NO: AAJHV3364H UDYAM NO: UDYAM-MH-19-0215467 Bank Account Details for Electronic Remittance: Account Holder Name: Orion Legal Supplies Account No.: 05221900002844 IFSC: DCBL0000052 Bank Name: DCB Bank Limited	For Orion Legal Supplies Vikram Futarmal Jain Authorised Signatory <small>Digitally signed by Vikram Futarmal Jain Date: 2024.02.01 18:18:32 +05'30'</small>
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Orion Legal Supplies

510, Safa Centre, Near Mangaldas Market, Zaveri Bazaar, Mumbai - 400 002

Email ID: contact@orionlegalsupplies.in | Website: www.orionlegalsupplies.in | Contact: 91586 39996

TAX INVOICE

Buyer Name: B P CAPITAL LIMITED Billing Address: 702, Arunachal Building, 19, Barakhamba Road, Connaught Place, New Delhi -110 001 State Code: 07 GSTIN of Buyer: 07AAACB0417B1ZK	Shipping Address: 702, Arunachal Building, 19, Barakhamba Road, Connaught Place, New Delhi -110 001 State Code: 07 Bill Type: ORIGINAL FOR RECIPIENT
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Buyer's Order No.	Dated (YYYY-M-D)	Invoice No.	Dated (YYYY-M-D)
PIT/OLS/2.0/BSE-536965	2022-11-16	GST/654/2022-23	2022-11-16
Dispatch Document No.	Delivery Note Date	Delivery Note	Mode/Terms of Payment
-	-	-	Banking
Dispatched through	Destination	Supplier's Ref.	Other Reference(s)
Online	New Delhi	-	-
Buyer Type: Corporate	Payment Due Date: Within 7 days of receipt		
Place of Supply: Delhi	Place of Delivery: Delhi		

Sl. No.	Description of Goods / Services	HSN/SAC	Qty	Rate	Amount
1	First Year Licence Fees for THE PIT Archive - Structured Digital Database Software (16.11.2022 - 15.11.2023)	SAC-997355	1	15000	15000
2	Exceptional Discount @ 5%				-750
TAXABLE VALUE					14250
GST @ 18%					
				CGST @ 0%	0
				SGST @ 0%	0
				IGST @ 18%	2565
TOTAL					16815

Amount in Words: Rupees Sixteen Thousand Eight Hundred Fifteen Only

Declaration:

- We declare that this tax invoice shows the actual price of the goods/services described and that all particulars are true and correct.
- We declare that there is no tax payable under reverse charge mechanism.

GSTIN NO: 27AAJHV3364H1ZR

PAN NO: AAJHV3364H

UAM NO: MH17A0042392

Bank Account Details for Electronic Remittance:

Account Holder Name: Orion Legal Supplies

Account No.: 05221900002844

IFSC: DCBL0000052

Bank Name: DCB Bank Limited

For Orion Legal Supplies

Vikram
Futarmal
Jain

Digitally signed
by Vikram
Futarmal Jain
Date: 2022.11.22
17:40:35 +05'30'

Authorised Signatory

THE PIT ARCHIVE DASHBOARD

Last Login : 24-05-2024 03:11:17 PM

Welcome COMPLIANCE_OFFICER of B P CAPITAL LIMITED

Nos. of Designated Person(s)	Nos. of Insider(s)	Nos. of Shared UPSI Instance(s)
12	0	12

Download Reporting Utility

- Annual Disclosure by Designated Person
- Know your Insider Disclosure by Insider
- Immediate Intimation on Sharing of UPSI

Database Usage Status :-

Used **4.3MB**

Out of 4.00 GB

Current Database Path :-

D:\SD DATABASE\The-PIT-Archive.sdf

LOG OUT

Date & Time of Download : 24/05/2024 16:19:50

BSE ACKNOWLEDGEMENT

Acknowledgement Number	5632314
Date and Time of Submission	5/29/2023 12:53:59 PM
Scripcode and Company Name	536965 - B. P. Capital Ltd
Subject / Compliance Regulation	Compliances-Reg.24(A)-Annual Secretarial Compliance
Submitted By	Shatrughan Sahu
Designation	Designated Officer for Filing

Disclaimer : - Contents of filings has not been verified at the time of submission.



B. P. CAPITAL LIMITED

CIN NO. : L74899HR1994PLC072042

REGD.OFFICE: Plot No- 138, Roz-Ka-MeolIndustrial Area,
Sohna (Distt. Mewat), Haryana-122103

Phones: 0124-2362471

Email : bpcapitalimited@gmail.com, Website : www.bpcapital.in

Dated: 27th May, 2023

**The Manager (Listing),
Bombay Stock Exchange Limited,
1st Floor, P. J. Towers,
DalalStreet,Mumbai – 400001**

Subject: Submission of Annual Secretarial Compliance Report for the Year Ended 31st March, 2023

Ref: BSE Scrip Code– 536965; DSE- File No. 8211; CSE– Scrip Code – 10012104

Dear Sir,

Please find enclosed herewith the Annual Secretarial Compliance Report for the year ended 31st March, 2023 in the prescribed format as per the requirements of Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for your kind perusal.

Please note that we are unable to upload the Annual Secretarial Compliance Report for the year ended 31st March, 2023 in the XBRL format at BSE's listing portal as the same is not available at BSE's listing portal. We hereby submit that we shall upload the Annual Secretarial Compliance Report for the year ended 31st March, 2023 in the XBRL format as soon as the same will be made available by BSE at its listing portal.

This is for your information and records please.

Thanking You.

**Yours Truly,
For B. P. Capital Limited**

SAKSHI GUPTA Digitally signed by SAKSHI GUPTA
Date: 2023.05.27 18:39:29 +05'30'

**Sakshi Gupta
Company Secretary**

Encl : As Above

C.C. :

**The Manager (Listing),
The Delhi Stock Exchange Ltd.,
DSE House, 3/1, Asaf Ali Road,
New Delhi – 110002**

**The Manager (Listing),
Calcutta Stock Exchange Limited,
7, Lyons Range,
Kolkatta, West Bengal – 700001**



Secretarial Compliance Report of M/s B. P. Capital Limited for the year ended 31st March, 2023

We, **Kundan Agrawal & Associates**, Company Secretaries having **FRN: S2009DE113700** and office at **E-21, Office No. 301, Jawahar Park, Laxmi Nagar, New Delhi-110092193** and **have examined:**

- (a) all the documents and records made available to us and explanation provided by "**B. P. Capital 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 2023 ("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; **(Not applicable on the company for the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable on the company for the period under review)**





- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; ***(Not applicable on the company for the period under review)***
- (g) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, regarding the Companies Act and dealing with client;
- (h) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; ***(Not applicable on the company for the period under review)***
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; ***(Not applicable on the company for the period under review)***
- (j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (k) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder; and 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:

• Refer Annexure “A” annexed to the Report

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

• Refer Annexure “B” annexed to the Report

I further report that –


• The Company has complied with the requirements of Structural Digital Data Base in terms of Securities & Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 including various Circulars issued by SEBI thereunder and Circular(s) issued by BSE Limited dated March 16, 2023.

Further to the matter and as advised in the BSE Notice No. 20230329-21 dated 29th March 2023 as well as BSE Notice No. 20230410-41 dated 10th April 2023, following are the additional information which is the part of ongoing Annual Secretarial Audit Report –


S.NO.	Particulars	Compliance Status	Observations/Rem
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		(Yes/No/NA)	marks by PCS*
1	Secretarial Standards: The Compliances of Listed Entity are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	Yes	NA
2	Adoption and timely updation of the Policies: <ul style="list-style-type: none">• All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the Listed Entity• All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars /guidelines issued by SEBI	Yes Yes	NA NA
3	Maintenance and disclosures on Website: <ul style="list-style-type: none">• 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	Yes Yes Yes	NA NA NA 



4	Disqualification of Director: None of the Director of the Company are disqualified under section 164 of the Companies Act, 2013	Yes	NA
5	To examine details related to subsidiaries of Listed Entity: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA NA	NA NA
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	NA
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 the SEBI Regulations.	Yes	NA 




8	<p>Related Party Transactions:</p> <p>(a) The Listed Entity has obtained prior approval of Audit Committee for all Related Party Transactions.</p> <p>(b) In case no prior approval obtained, the Listed Entity shall provide detailed reasons along with confirmation whether the transactions were subsequently Approved/ratified/rejected by the Audit Committee.</p>	<p>Yes</p> <p>NA</p>	<p>For the Financial Year 2022-23, the listed entity has obtained approval of shareholders for all the related party transactions.</p>
9	<p>Disclosure of events or information:</p> <p>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.</p>	<p>Yes</p>	<p>NA</p>
10	<p>Prohibition of Insider Trading</p> <p>The Listed Entity is in compliance with Regulation 3(5) and 3(6) SEBI (Prohibition and Insider Trading) Regulations, 2015.</p>	<p>Yes</p>	<p>NA</p>
11	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>Actions taken against the Listed Entity/ its Promoters/ Directors either by SEBI or by Stock</p>	<p>No</p>	<p>Due to paucity of</p>






	Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) during the F.Y. ending 31 st March, 2023	The company has not paid annual listing fees of the stock exchange for the financial year 2022-2023. The company has been marked under the Graded Surveillance Measure(GSM) Stage 0 by the Bombay Stock Exchange.	funds the Annual Listing Fees to BSE could not be paid. The Company is trying its level best to arrange funds & is expected to pay the fees in very near future.
11	Additional Non-Compliances, if any: No any additional non-compliance observed for all SEBI regulatory/circular/guidance note etc.	NA	NA

Compliances related to resignation of Statutory Auditors from Listed Entity and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

S.No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report, for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end 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</p> <p>iii. If the auditor has signed the limited review</p>	NA	 No Event has been occurred for resignation of the Auditor and hence, the existing Auditor has duly signed the Limited Review Report(LLR)/Audit



	/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 such financial year.		Report for all four quarters as well as reporting F.Y.
2.	Other Conditions relating to resignation of Statutory Auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/ its material subsidiary to the Audit Committee:</p> <p>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.</p> <p>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 by the Management, as applicable.</p> <p>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.</p>	<p>NA</p> <p>NA</p> <p>NA</p>	<p>NA</p> <p>No Event has been occurred for resignation of the Auditor</p> <p>As there was no event for resignation of Auditor, no information was required to be received and communicated.</p>
	<p>ii. Disclaimer in case of non-receipt of information:</p>		



Kundan Agrawal & Associates

Company Secretaries

Phone: 91-11-43093900

Mobile: 09212467033, 09999415059

E-mail: agrawal.kundan@gmail.com

	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.	NA	NA
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/CFR/CMD1/114/2019 dated 18 th October, 2019.	NA	NA

Place: New Delhi

Date: 27/05/2023

**For Kundan Agrawal & Associates
Company Secretaries**



**Kundan Agrawal
Company Secretary
Membership No. 7631**

C.P. No. 8325

UDIN: F007631E000398912

Annexure "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: –

Compliance Requirement (Regulations/Circulars/ guidelines including specific clause)	Regulation/ Circular No	Deviations	Action taken by	Type of Action (Advisory/Clarification/Fin e/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company)	Management Response	Remarks
Regulation 14 of the SEBI (Listing Obligations and Disclosure Requirements), 2015-Fees and other Charges to be paid to the recognized stock exchange(s)	Regulation 14 of the SEBI (Listing Obligations and Disclosure Requirements), 2015	Non- payment of Annual Listing Fees to the Bombay Stock Exchange Limited (BSE) for the F.Y. 2022-23	Bombay Stock Exchange Limited (BSE)	The Company has defaulted in payment of Annual Listing Fees to BSE and, therefore, BSE had sent an advisory to the company for payment of outstanding listing fees till 16th May, 2023, failing which the trading of the scrip of the company would be suspended. After the year under review, BSE has suspended the trading of the scrip of the company on BSE's web portal due to non-payment of annual listing fees w.e.f. 17th May, 2023. However, BSE pursuant to its notice no. 20210219-31 dated 19 Feb, 2021 has allowed the trading of shares of the company on Trade-for-Trade basis only on the first trading day of every week till the company	The company has defaulted in payment of Annual Listing Fees to BSE for the F.Y. 2022-23 as per Regulation 14 of the SEBI (Listing Obligations and Disclosure Requirements), 2015	NA	As per the explanations provided to us by the management of the Company, the company is trying to arrange the necessary funds to clear its outstanding listing fees and the company is committed to pay the listing fees in near future.	Due to paucity of funds the Annual Listing Fees to BSE could not be paid. The Company is trying its level best to arrange funds & is expected to pay the fees in very near future.	-
GSM Framework vide Exchange notice no. 20170223-44 dated February 23, 2017	GSM Framework vide Exchange notice no. 20170223-44 dated February 23, 2017	No Violation of any Regulation of SEBI (LODR) Regulations, 2015	Bombay Stock Exchange Limited (BSE)	The company has been marked under the Graded Surveillance Measure (GSM) Stage 0 by the Bombay Stock Exchange.	No Violation of any Regulation of SEBI (LODR) Regulations, 2015	NA	The company is trying to improve its financial position. The management of the company is exploring the market and business opportunities and is putting necessary efforts in this respect so that the operations of the company can be started again	In the absence of any operations during the year under review, there is a decline in the operating activities of the company. The management of the company is exploring the market and business opportunities and is putting necessary efforts in this respect so that the operations of the company can be started again and the financial position & net worth of the company could be improved.	-

Annexure "B"

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

Compliance Requirement (Regulations/Circulars/ guidelines including specific clause)	Regulation/ Circular No	Deviations	Action taken by	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company)	Management Response	Remarks
Regulation 14 of the SEBI (Listing Obligations and Disclosure Requirements), 2015-Fees and other Charges to be paid to the recognized stock exchange(s)	Regulation 14 of the SEBI (Listing Obligations and Disclosure Requirements), 2015	Late payment of Annual Listing Fees to the Bombay Stock Exchange Limited (BSE) for the F.Y. 2021-22	Bombay Stock Exchange Limited (BSE)	Advisory received from BSE for payment of outstanding listing fees	The company has made the late payment of Annual Listing Fees to BSE for the F.Y. 2021-22 as per Regulation 14 of the SEBI (Listing Obligations and Disclosure Requirements), 2015	NA	The company has made the default good by making the payment of Annual Listing Fees to BSE	The Company has made the payment of Annual Listing Fees to BSE on 21-09-2021 and, therefore, has made the default good.	-
GSM Framework vide Exchange notice no. 20170223-44 dated February 23, 2017	GSM Framework vide Exchange notice no. 20170223-44 dated February 23, 2017	No Violation of any Regulation of SEBI(LODR) Regulations, 2015	Bombay Stock Exchange Limited (BSE)	The company has been marked under the Additional Surveillance Measure (ASM) Stage 1	No Violation of any Regulation of SEBI(LODR) Regulations, 2015	NA	The company is trying to improve its financial position. The management of the company is exploring the market and business opportunities and is putting necessary efforts in this respect so that the operations of the company can be started again	In the absence of any operations during the year under review, there is a decline in the operating activities of the company. The management of the company is exploring the market and business opportunities and is putting necessary efforts in this respect so that the operations of the company can be started again and the financial position & net worth of the company could be improved.	-

**For Kundan Agrawal & Associates
Company Secretaries**



**Place: New Delhi
Date:27/05/2023**

**Kundan Agrawal
Company Secretary
Membership No. 7631
C.P. No. 8325**



Secretarial Compliance Report of M/s B. P. Capital Limited for the year ended 31st March, 2024

We, **Kundan Agrawal & Associates**, Company Secretaries having **FRN: S2009DE113700** and office at **E-21, Office No. 301, Jawahar Park, Laxmi Nagar, New Delhi-110092** have **examined:**

- (a) all the documents and records made available to us and explanation provided by "**B. P. Capital 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, 2024 ("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; **(Not applicable on the company for the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;**(Not applicable on the company for the period under review)**





- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; ***(Not applicable on the company for the period under review)***
- (g) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, regarding the Companies Act and dealing with client;
- (h) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; ***(Not applicable on the company for the period under review)***
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; ***(Not applicable on the company for the period under review)***
- (j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (k) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder; and 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:

• Refer Annexure “A” annexed to the Report

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

• Refer Annexure “B” annexed to the Report


I further report that –

• The Company has complied with the requirements of Structural Digital Data Base in terms of Securities & Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 including various Circulars issued by SEBI thereunder and Circular(s) issued by BSE Limited dated March 16, 2023.


Further to the matter and as advised in the BSE Notice No. 20230329-21 dated 29th March 2023 as well as BSE Notice No. 20230410-41 dated 10th April 2023, following are the additional information which is the part of ongoing Annual Secretarial Audit Report –





S.NO.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1	Secretarial Standards: The Compliances of Listed Entity are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	Yes	NA
2	Adoption and timely updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the Listed EntityAll the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars /guidelines issued by SEBI	Yes Yes	NA NA
3	Maintenance and disclosures on Website: <ul style="list-style-type: none">The Listed Entity is maintaining a functional websiteTimely dissemination of the documents/information under a separate section on the websiteWeb-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/secti	Yes Yes Yes	NA NA NA 



	on of the website		
4	Disqualification of Director: None of the Directors of the Company are disqualified under Section 164 of the Companies Act, 2013	Yes	NA
5	To examine details related to subsidiaries of Listed Entity: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA NA	NA NA
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	NA
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 the	Yes	NA 




Kundan Agrawal & Associates

Company Secretaries

Phone: 91-11-43093900

Mobile: 09212467033, 09999415059


E-mail: agrawal.kundan@gmail.com

			Circular(s) issued by BSE Limited dated March 16, 2023.
11	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No Actions taken against the Listed Entity/ its Promoters/ Directors either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) during the F.Y. ending 31st March, 2024</p>	<p>No</p> <p>The company has not paid annual listing fees of the stock exchange for the financial year 2022-2023 and 2023-2024.</p> <p>The shares of the Company have been suspended from BSE on account of non payment of Annual Listing Fees. However, BSE pursuant to its notice no. 20210219-31 dated 19 Feb, 2021 has allowed the trading of shares of the company on Trade-for-Trade basis only on the first trading day of every week till the company makes payment of outstanding ALF to the Exchange.</p> <p>The company has been marked under the Graded Surveillance Measure(GSM) Stage 0 by the Bombay Stock Exchange.</p>	<p>Due to paucity of funds the Annual Listing Fees to BSE could not be paid. The Company is trying its level best to arrange funds & is expected to pay the fees in very near future.</p> 
11	<p>Additional Non-Compliances, if any:</p> <p>Any additional non-compliance observed for all SEBI regulatory/circular/guida</p>	NA	NA




	nce note etc.		
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Compliances related to resignation of Statutory Auditors from Listed Entity and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

S.No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report, for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end 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</p> <p>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 such financial year.</p>	NA	No Event has been occurred for resignation of the Auditor and hence, the existing Auditor has duly signed the Limited Review Report (LRR) for all first three quarters of the reporting F.Y 2023-2024.
2.	Other Conditions relating to resignation of Statutory Auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/ its material subsidiary to the Audit Committee:</p> <p>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</p>	NA	NA 



	<p>Committee meetings.</p> <p>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 by the Management, as applicable.</p> <p>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.</p> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>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.</p>	<p>NA</p> <p>NA</p> <p>NA</p>	<p>No Event has been occurred for resignation of the Auditor</p> <p>As there was no event for resignation of Auditor, no information was required to be received and communicated.</p> <p>NA</p> 
<p>3.</p>	<p>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/CFR/CMD1/114/2019 dated 18th October, 2019.</p>	<p>NA</p>	<p>NA</p>



Kundan Agrawal & Associates

Company Secretaries

Phone: 91-11-43093900

Mobile: 09212467033, 09999415059

E-mail: agrawal.kundan@gmail.com

Place: New Delhi

Date: 27/05/2024

**For Kundan Agrawal & Associates
Company Secretaries**



**Kundan Agrawal
Company Secretary**

Membership No. 7631

C.P. No. 8325

UDIN: F007631F000452196



B. P. CAPITAL LIMITED

CIN NO. : L74899HR2094PLC072042

REGD.OFFICE: Plot No- 138, Roz-Ka-MeolIndustrial Area,
Sohna (Distt. Mewat), Haryana-122103

Phones: 0124-2362471

Email : bpcapitalimited@gmail.com, Website : www.bpcapital.in

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31ST MARCH, 2023

(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Sakshi Gupta, Compliance Officer of B. P. Capital Limited, am aware of the compliance requirement of Structured Digital Database (SDD) pursuant to provisions of Regulation 3(5) and 3(6) of **Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015** (PIT Regulations) and I certify that

1. the Company has a Structured Digital Database in place -YES
2. control exists as to who can access the SDD - YES
3. all the UPSI disseminated in the previous quarter have been captured in the Database - YES
4. the system has captured nature of UPSI along with date and time - YES
5. the database has been maintained internally and an audit trail is maintained - YES
6. the database is non-tamperable and has the capability to maintain the records for 8 years - YES

I also confirm that the Company was required to capture **02** number of events during the quarter ending on 31st March, 2023 and has captured **02** number of the said required events.

I would like to report that the following non-compliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard: N. A.

Pursuant to Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Company is maintaining the Structured Digital Database digitally in the "THE PIT ARCHIEVE" software installed.

Our Company is thus a compliant company of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

For B. P. Capital Limited

SAKSHI GUPTA Digitally signed by SAKSHI GUPTA
Date: 2024.05.30 10:52:15 +05'30'

Sakshi Gupta
Company Secretary & Compliance Officer

Date: 29-05-2024

Place: Haryana



B. P. CAPITAL LIMITED

CIN NO. : L74899HR2094PLC072042

REGD.OFFICE: Plot No- 138, Roz-Ka-MeolIndustrial Area,
Sohna (Distt. Mewat), Haryana-122103

Phones: 0124-2362471

Email : bpcapitalimited@gmail.com, Website : www.bpcapital.in

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30TH JUNE, 2023

(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Sakshi Gupta, Compliance Officer of B. P. Capital Limited, am aware of the compliance requirement of Structured Digital Database (SDD) pursuant to provisions of Regulation 3(5) and 3(6) of **Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015** (PIT Regulations) and I certify that

1. the Company has a Structured Digital Database in place -YES
2. control exists as to who can access the SDD - YES
3. all the UPSI disseminated in the previous quarter have been captured in the Database - YES
4. the system has captured nature of UPSI along with date and time - YES
5. the database has been maintained internally and an audit trail is maintained - YES
6. the database is non-tamperable and has the capability to maintain the records for 8 years - YES

I also confirm that the Company was required to capture **02** number of events during the quarter ending on 30th June, 2023 and has captured **02** number of the said required events.

I would like to report that the following non-compliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard: N.A.

Pursuant to Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Company is maintaining the Structured Digital Database digitally in the "THE PIT ARCHIEVE" software installed.

Our Company is thus a compliant company of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

For B. P. Capital Limited

SAKSHI GUPTA Digitally signed by SAKSHI GUPTA
Date: 2024.05.30 10:53:15 +0530'

Sakshi Gupta
Company Secretary & Compliance Officer

Date: 29-05-2024

Place: Haryana



B. P. CAPITAL LIMITED

CIN NO. : L74899HR2094PLC072042

REGD.OFFICE: Plot No- 138, Roz-Ka-MeolIndustrial Area,
Sohna (Distt. Mewat), Haryana-122103

Phones: 0124-2362471

Email : bpcapitallimited@gmail.com, Website : www.bpcapital.in

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30TH SEPTEMBER, 2023
(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Sakshi Gupta, Compliance Officer of B. P. Capital Limited, am aware of the compliance requirement of Structured Digital Database (SDD) pursuant to provisions of Regulation 3(5) and 3(6) of **Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015** (PIT Regulations) and I certify that

1. the Company has a Structured Digital Database in place -YES
2. control exists as to who can access the SDD - YES
3. all the UPSI disseminated in the previous quarter have been captured in the Database - YES
4. the system has captured nature of UPSI along with date and time - YES
5. the database has been maintained internally and an audit trail is maintained - YES
6. the database is non-tamperable and has the capability to maintain the records for 8 years - YES

I also confirm that the Company was required to capture **02** number of events during the quarter ending on 30th September, 2023 and has captured **02** number of the said required events.

I would like to report that the following non-compliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard: N.A.

Pursuant to Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Company is maintaining the Structured Digital Database digitally in the "THE PIT ARCHIEVE" software installed.

Our Company is thus a compliant company of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

For B. P. Capital Limited

SAKSHI GUPTA Digitally signed by SAKSHI GUPTA
Date: 2024.05.30 10:54:00 +0530'

Sakshi Gupta
Company Secretary & Compliance Officer

Date: 29-05-2024

Place: Haryana



B. P. CAPITAL LIMITED

CIN NO. : L74899HR2094PLC072042

REGD.OFFICE: Plot No- 138, Roz-Ka-MeolIndustrial Area,
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Email : bpcapitallimited@gmail.com, Website : www.bpcapital.in

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31ST DECEMBER, 2023
(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Sakshi Gupta, Compliance Officer of B. P. Capital Limited, am aware of the compliance requirement of Structured Digital Database (SDD) pursuant to provisions of Regulation 3(5) and 3(6) of **Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015** (PIT Regulations) and I certify that

1. the Company has a Structured Digital Database in place -YES
2. control exists as to who can access the SDD - YES
3. all the UPSI disseminated in the previous quarter have been captured in the Database - YES
4. the system has captured nature of UPSI along with date and time - YES
5. the database has been maintained internally and an audit trail is maintained - YES
6. the database is non-tamperable and has the capability to maintain the records for 8 years - YES

I also confirm that the Company was required to capture **02** number of events during the quarter ending on 31st December, 2023 and has captured **02** number of the said required events.

I would like to report that the following non-compliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard: N.A.

Pursuant to Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Company is maintaining the Structured Digital Database digitally in the "THE PIT ARCHIEVE" software installed.

Our Company is thus a compliant company of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

For B. P. Capital Limited

SAKSHI GUPTA

Digitally signed by SAKSHI
GUPTA
Date: 2024.05.30 10:54:47
+05'30'

Sakshi Gupta
Company Secretary & Compliance Officer

Date: 29-05-2024

Place: Haryana



B. P. CAPITAL LIMITED

CIN NO. : L74899HR2094PLC072042

REGD.OFFICE: Plot No- 138, Roz-Ka-MeolIndustrial Area,
Sohna (Distt. Mewat), Haryana-122103

Phones: 0124-2362471

Email : bpcapitallimited@gmail.com, Website : www.bpcapital.in

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31ST MARCH, 2024

(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Sakshi Gupta, Compliance Officer of B. P. Capital Limited, am aware of the compliance requirement of Structured Digital Database (SDD) pursuant to provisions of Regulation 3(5) and 3(6) of **Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015** (PIT Regulations) and I certify that

1. the Company has a Structured Digital Database in place -YES
2. control exists as to who can access the SDD - YES
3. all the UPSI disseminated in the previous quarter have been captured in the Database - YES
4. the system has captured nature of UPSI along with date and time - YES
5. the database has been maintained internally and an audit trail is maintained - YES
6. the database is non-tamperable and has the capability to maintain the records for 8 years - YES

I also confirm that the Company was required to capture **02** number of events during the quarter ending on 31stMarch, 2024 and has captured **02** number of the said required events.

I would like to report that the following non-compliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard: N.A.

Pursuant to Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Company is maintaining the Structured Digital Database digitally in the "THE PIT ARCHIEVE" software installed.

Our Company is thus a compliant company of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

For B. P. Capital Limited

SAKSHI GUPTA Digitally signed by SAKSHI
GUPTA
Date: 2024.05.30 10:56:08
+05'30'

Sakshi Gupta
Company Secretary & Compliance Officer

Date: 29-05-2024

Place: Haryana