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

### Balmer Lawrie Investments Ltd.

(A Government of India Enterprise)

पंजीकृत कार्यालय : 21, नेतानी सुघाष रोड कोलकाता - 700 001 क्रीन : (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

ABHISHE Digitally signed by ABHISHEK LAHOTI Date: 2024.05.30 13:24:37 +05'30'

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: "ABHISHICK POINT" 4th Floor, 152, S. F. Mukharjee Road, Kolkata - 700028 Phone: (003) 4060 1148 (2465 0061 E-mail: Ithatorjeesenoostee@ggmal.com Delbt Office: 1208, 12th Floor, Amail Tower, 38 Nathru Floor, New Celhi, 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	Compliance Status	Observations
No.		(Yes/No/NA)	/ Remarks by
		, , ,	PCS *



2	Adoption and timely updation of the	Yes
	Policies:	
	All applicable policies under SEBI	
	Regulations are adopted with the	
	approval of board of directors of the listed entities	
	nstea entities	
	All the policies are in conformity with	
	SEBI Regulations and has been reviewed	
	& timely updated as per the	
	regulations/circulars/guidelines issued	
	by SEBI	
3	Maintenance and disclosures on Website:	Yes
	TT T	
	The Listed entity is maintaining a functional website	
	Turicuoriai 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
4	None of the Director of the Company are	ies
	disqualified under Section 164 of	
	Companies Act, 2013.	
5	Details related to Subsidiaries of listed	Yes
	entities have been examined w.r.t.:	
	( ) 11 ( ) ( )	
	(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	
	<ul> <li>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions; or</li> <li>(b) The listed entity has provided detailed reasons along with confirmation whether the</li> </ul>	No such instances	
	transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.		
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		
	herein (**)		
12	Additional non-compliances, if any:	Yes	
	No additional non-compliance		
	observed for any SEBI		
	regulation/circular/guidance note		
	etc.		

<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.	Partic	rulars	Compliance Status	Observations/
No.			(Yes/No/NA)	Remarks by PCS *
1	Comp	pliances with the following cor	nditions while appoin	ting/re-appointing an
	audite	or		
	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,		resignation by the
	the auditor before such		Auditors.
	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		
	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.		
2	Other conditions relating to resignation	on of statutory auditor	
	i. Reporting of concerns by Auditor	NA	There was no event
	with respect to the listed		of resignation of
	entity/its material subsidiary to		Statutory Auditors
	the Audit Committee:		of the Listed Entity
			during the review
	a. In case of any concern with the		period or any event
	management of the listed		where concern with
	entity/material subsidiary		the management of
	such as non-availability of		the Company was
	information / non-cooperation		expressed. The
	by the management which has		Company does not
	hampered the audit process,		have a material
	the auditor has approached		subsidiary.
	the Chairman of the Audit		J
	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.		
	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 /		
	<u> </u>	l	

	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 Requirement t (Regulations circul rs/ guide ines includ ing specifi c clause )	lation / Circu lar l No. /	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
Claus Regul tion of Regul tion 1 of SEBI (Listin g Obligations and Disclosure Requi ement s) Regul tions, 2015	a (Listi ng Oblig a ations f 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	
	tion 17	Oblig	Quorum			Independent	(Inclu	Governmen	has	
	of	ations	of			during the	sive	t Company,	applie	
	SEBI	and				-	of			
			Meeting			review period,		the	d for	
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	g	osure	Board of			quorum of	(Fine	n of the	r of	
	Obliga	Requi	Directors			Board	impo	Board of	such	
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	sure	ations					ers		-	
						Regulation		direction of	any	
	Requir	, 2015				17(2A) of	ende	the	being	
	ement					SEBI (Listing	d on	Administrat	a	
	s)					Obligations &	June,	ive Ministry	Gover	
	Regula					Disclosure	23,	and thus,	nment	
	tions,					Requirements	Sep,	the non-	Comp	
	2015					_	23,		-	
	2010					) Regulations,	Dec,	compliance	any,	
						2015	23	was beyond	the Comp	
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	Regula	ng	e of	ted		not have any	60/-	being a	entity
	tion 18	Oblig	compositi			Independent	(Inclu	Governmen	has
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	SEBI	and	Audit			during the	of CCT)	the	d for
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	sure	ations				was not in	ers	direction of	any
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	ement					Clause 18(1)	d on	Administrat	a



	s) Rogula					of SEBI	June, 23,	ive Ministry	Gover	
	Regula					(LODR)		and	nment	
	tions, 2015					Regulations,	Sep,	thus,the	Comp	
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	tion 18	Oblig	quorum			Independent		Governmen	being	
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	_	_				requirement of		"		

	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 constitutio n 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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		`	e of			not have any			*	
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	tion 19	Oblig	Quorum			Independent		Governmen	being	
	of	ations	of the			Director hence,		t Company,	a	
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	g	osure	Remunerat			quorum of NRC		n of the	Comp	
	Obliga	Requi	ion			Committee		-	- 1	
		_	Committee			was not met at		,	any,	
	tions	reme						Directors is	the	
	and	nts)	was not as			the Meeting of		dependent	appoi	
	Disclo	Regul	met			NRC during the		on the	ntmen	
	sure	ations				FY 2023-24		direction of	t of	
	Requir	, 2015						the	direct	
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7	Clause	SEBI	Non	BSE	Fine	The Board of	Rs	The	The	
	2A of	(Listi	Complianc	Limi		Directors did	6,49,0	Company	listed	
	Regula	ng	e pf	ted		not have any	00/-	being a	entity	
	tion 20	Oblig	Constitutio	ica		Independent	(Inclu	Governmen	has	
		_	n of the			Director.	`			
	of	ations					sive	t Company,	applie	
	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 the Stakeholde Relationsh Committee was not in with Regulation 20(2A) of LODR Regulation 2015	impo sed sed for quart ers ende d on June, 23,	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	fines as the Comp	
				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-compl iance was beyon d the contro l of the Comp any.	

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8	BSE	Fines	The Stock	Rs		
	Limi		Exchange had	6,49,0		
	ted		levied fine	00/-		
			pertaining to	(Inclu		
			Non-	sive		
			Compliance	of		
			with the	GST)		
			Constitution of	(Fine		
			Risk	impo		
			Management	sed		
			Committee.	for		
			However, as	quart		
			per Regulation	ers		
			21(5) of SEBI	ende		
			(LODR)	d on		
			Regulations,	June,		
			2015 the	23,		
			requirement of			
			having Risk	Sep, 23,		
			Management	I I		
			Committee is	Dec, 23		
			applicable for	1		
			top 1000 listed	and		
			entities and	Marc		
			since, the	h, 24		
			Company did			
			not fall in the			
			said category,			
			the			
			requirement			
			was not			
			applicable to			
			the Company.			
			The same had			
			been			
	1		communicated			
	1		to the Stock			
			Exchange by			
	1		the Company			
	1		through its			
	1		wavier			
	1		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 ks
	Clause Regulat ion 1 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	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 noncompliance 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 Requireme 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.	The Compa 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 compl iance of comp ositio 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

	11#0	nto)	mittee			from 12-07-		Dinastana	Company	atrativo
	ure	nts)	пппее			2022 to 31-		Directors	Company,	strative
	Require	Regul						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	strative
						Committee		Ministry	on the	is
						was below		and thus,	direction	awaited
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						members of		beyond the	Ministry	
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						2023 to 31-		Company.	complianc	
						03-2023.			e was	
						03 2023.			beyond	
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						Chairperson			of the	
						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
	of SEBI	ation	quoru			Independent		nt	nt	the
	(Listing	s and	m of			Director till		Company,	Company,	matter
	Obligat	Discl	the			11-07-2022		the	the	to the
	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			the control	
	ments)	ation				Independent		is denominant	of the	y. The
	,					Director		dependent		-
	Regulat					from 12-07-		on the	company.	directio
	ions,	2015				2022, hence,		direction		ns of
	2015					the		of the		the
						requirement		Administra		Admini
						-		tive		strative
						of quorum		Ministry		is
						of Audit		and thus,		awaited
L		l		<u> </u>						

						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 Commi ttee	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	DCE	Pin a	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	Do	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 directio ns 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	SEBI (Listi ng Oblig ation s and Discl osure Requi reme nts) Regul ation s, 2015	Non-Comp liance pf Consti tution of the Stake holder s Relati onshi p Com mittee	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	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.



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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

