



**BL KASHYAP**  
WE BUILD YOUR WORLD

May 30, 2019

Department of Corporate Services, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001	Listing Department, National Stock Exchange of India Ltd, Exchange Plaza, Plot No. C/1, G Block, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051
ISIN Code	: INE350H01032
Scrip Code : 532719	Trading Symbol : BLKASHYAP

Dear Sir / Madam,

**Sub: Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2019**

With reference to the SEBI circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed Annual Secretarial Compliance Report duly signed by the Practicing Company Secretary for the financial year ended March 31, 2019.

Kindly take the above information on your record.

Thanking you,

Yours faithfully,

For B.L. Kashyap and Sons Limited

**Pushpak Kumar**  
GM-Corporate Affairs & Company Secretary  
M. No.: F6871



Encl: as above

**B L Kashyap & Sons Ltd.**  
(CIN : L74899DL1989PLC036148)  
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New Delhi 110 025, India  
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**SUNITA VERMA**  
Company Secretary

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**SECRETARIAL COMPLIANCE REPORT**  
of  
**B. L. Kashyap and Sons Limited**  
for the year ended 31<sup>st</sup> March, 2019

To  
**B. L. Kashyap and Sons Limited**  
409, 4<sup>th</sup> Floor DLF Tower-A, Jasola  
New Delhi-110025

I, Sunita Verma, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by B. L. Kashyap and Sons 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 31.03.2019 ("Review Period") in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;





- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and based on the above examination, I/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.	The Company is required to allot the shares on conversion of warrants within 18 months from the date of allotment of warrants	Reg. 162 of SEBI (Issue of Capital and Disclosure Requirements), Regulation, 2018	Delay in conversion of warrants within 18 months from the date of allotment

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	Stock Exchanges (BSE & NSE)	Non-compliance of Reg. 162 of SEBI (Issue of Capital and Disclosure Requirements), Regulation, 2018	Fine amounting Rs. 1,65,200 imposed by each stock exchange	The Company has paid fine for 7 days delay as required by SEBI





**SUNITA VERMA**  
Company Secretary

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

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2019	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: New Delhi  
Date: 28.05.2019



  
**SUNITA VERMA**  
FCS No.: 6724  
C P No.: 7276