

BASANT INDIA LIMITED

R.O.: 912, IndraPrakash Building, 21, Barakhamba Road, New Delhi 110001

Email Id: basant.indiaa@gmail.com, Tel No. 011-237165341

CIN: L51909DL1985PLC021396

To,

Date:30.05.2023

Metropolitan stock exchange of India (MSE)
Vibgyor Towers, 4th floor,
Plot No C 62, G Block, opp. Trident hotel,
Bandra Kurla Complex, bandra (E),
Mumbai, 400098

Sub: Submission of Annual Secretarial Compliance Report for the year ended on 31.03.2023

Dear Sir

Persuant to Regulation 24A SEBI (Listing Obligations and Disclosure Requirements), 2015 Please find enclosed Annual Secretarial Compliance report for the financial year ended on 31.03.2023 issued by M/s. Puneet Pandey & Associates, Practicing Company Secretaries. You are required to take the same on records.

Thanking You,

For Basant India Limited



(Compliance officer)



Secretarial Compliance Report of **BASANT INDIA LIMITED** for the financial year ended 31ST March,2023

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **BASANT INDIA LIMITED** (hereinafter referred as 'the listed entity'), having its Registered Office at 912 INDRA PRAKASH BUILDING, 21 BARAKHAMBA ROAD NEW DELHI-110001 Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations 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 the listed entity has, during the review period covering the financial year ended on 31st March,2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We have examined:

- (a) all the documents and records made available to us and explanation provided by Basant India 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 report, for the financial 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-Not Applicable as the company did not issue any securities during the financial year under review;
- (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 as the company has not buy back any of securities during the financial year under review
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021- Not Applicable as the company has not granted any share-based benefits to its employees during the financial year under review
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021- Not Applicable as the company did not issue any securities during the financial year under review
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) (other regulations as applicable)

Based on the above examination, I/We hereby report that, during the Review Period:

- 1. (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)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practising Company Secretary	Management Response	Remarks
1	Regulation NO-6 of SEBI (LODR) Regulation, 2015 which states that Listed entity shall appoint Qualified Company Secretary as compliance officer	Regulation -6	Company Secretary had ben resigned from company since 08-08-2022	-	-	-	-	There is no company secretary in the company since 08-08-2022	Since the resignation of CS we are searching for suitable candidate but not found the same however one candidate is finalised will be appointed in the upcoming board meeting	Acknowledged
2	Regulation No-30(4) ready with schedule III Part-A clause-7 of SEBI (LODR) regulation which envisaged that Change in auditor, Director, KMP, Compliance officer needs to be disclosed to stock exchange	Regulation No-30(4)	Disclosed to stock exchange in general regulation	-	-	-	-	Company had disclosed as well as intimated to stock exchange regarding change of auditor in outcome of board meeting itself	There is no as such separate option available On MSEI portal that's why we had intimate to stock exchange the same under different way to comply with the regulation	Acknowledged



	circular No CIR/ISD/3/2011 which states that 100% promoters shareholding must be in Demat form	CIRCULAR NO- CIR/ISD/3/2011	promoters shareholding is not in demat form					is taking steps for dematerialization also fifteen lakh shares had been dematerialized in the review period along with the previous data of twenty lakh shares in total now thirty five lakh shares are converted	is in process to dematerialized the promoters shareholdings	wledge
4	SEBI (PIT) Regulations, 2015	Regulation 3(5)	Instead of SDD software company is preferring Excel sheet for storing data	-	-	-	-	Data of all UPSI had been stored in password protected excel sheet	Will purchase and install the SDD software.	Acknowledged

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

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Re- marks
1	Regulation 33 of SEBI (LODR) Regulation, 2015	Regulation 33	Non-compliance of Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements)	Metropolitan Stock Exchange of India Limited (MSEI)	Penalty	An e-mail has been sent by the Metropolitan Stock Exchange of India	Rs 3,42,000/- inclusive of GST of Rs 52,500/-	The Company had submitted the said financial results for the quarter	Company had paid full amount of penalty imposed	



		<p>s, 2015 with regard to non-submission of financial result for the quarter and year ended 31st March, 2021, the same has not been submitted to the stock exchange.</p>		<p>on 16th August, 2021 for imposing fine as per SEBI circular no. SEBI/HO/CFD/CMD/CI R/P/2020/12 dated January 22, 2020 with respect to the non-compliance of the Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regard to non-submission of financial result for the quarter and year ended 31st March, 2021, and a fine of Rs. 3,42,000 (Including GST of Rs. 52,200/-) was imposed on the Company.</p>	<p>year ended 31st March, 2021 in XBRL mode on 29-06-2021 but due to some technical glitch the pdf file for the financial results had not been uploaded, the pdf file of the same was uploaded on 30.08.2021 and paid the fine of Rs. 3,42,000/- (Including GST of Rs. 52,200/-). Rs 1,71,100/- (Inclusive of GST) was paid on 1st September, 2021 and Rs 1,71,100/- (Inclusive of</p>	
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								was paid on 2nd September, 2021.	
2	SEBI circular No CIR/ISD/3/2011 which states that 100% promoters shareholding must be in Demat form	SEBI CIRCULAR NO- CIR/ISD/3/2011						Company had taken effective steps for demat the shares as per data last year fifteen lakh new shares had been converted to demat of promoters	Company in process to make all promoters shareholding in demat form

II. 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. 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>	<p>NA</p> <p>NA</p> <p>NA</p>	<p>There is no resignation of auditor in the company</p> <p>There is no resignation of auditor in the company</p> <p>There is no resignation of auditor in the company</p>
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 or 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</p>	<p>NA</p> <p>NA</p>	<p>resignation of auditor in the company</p> <p>There is no resignation of auditor in the company</p>
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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
	<p>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: The auditor has provided an appropriate</p>	<p>NA</p> <p>NA</p> <p>NA</p>	



	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	

iii. we hereby report that, during the review period the compliance status of the listed entity is appended as below :

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	YES	



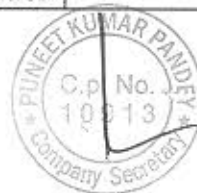
Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	<p>YES</p> <p>YES</p>	
3.	<p>Maintenance and disclosures on Website:</p> <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 	<p>YES</p> <p>YES</p> <p>YES</p>	
4.	<p>Disqualification of Director:</p> <p>None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	<p>YES</p>	



5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	NA	There is no subsidiary of the company
6.	<p>Preservation of Documents:</p> <p>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.</p>	YES	



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	YES	
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	YES NA	
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>	NO	In the case of change in auditor company had made disclosure to the MSEI in the outcome of board meeting itself
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	YES	
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>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</p>	YES	



	separate paragraph herein (**).		
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	YES	

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: New Delhi

Date: 30-05-2023

for **Puneet Pandey & Associates**


 Puneet Kumar Pandey
 Proprietor
 COP No-10913

UDIN : A029848E000427718

Peer Review No-2477/2022