

# BASANT INDIA LIMITED

R.O.: 912, Indra Prakash Building, 21, Barakhamba Road, New Delhi-110001

Email Id: [basant.indiaa@gmail.com](mailto:basant.indiaa@gmail.com). Tel no. 011 237165341

CIN: L51909DL1985PLC021396

---

Date: 27.05.2021

To  
The Listing Department  
Metropolitan Stock Exchange of India Limited  
Vibgyor Towers, 4<sup>th</sup> floor, Plot no. C-62G  
Block Opp. Trident Hotel, Bandra Kurla  
Complex, Bandra (E)  
Mumbai-400098

**Sub: Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015- ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE F. Y. ENDED MARCH 31, 2021**

**Dear Sir/Madam**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we hereby submit the copy of **Annual Secretarial Compliance Report for the F. Y. ended March 31, 2021 issued by S. K. Hota and Associates, Company Secretaries.**

This is for your record purpose.

Thanking You  
Yours Faithfully  
For Basant India Limited



Sudhanshu Sekhar Nayak  
Company Secretary

# S.K. HOTA & ASSOCIATES

Company Secretaries

212, Ground Floor,  
Savitri Nagar,  
New Delhi-110017  
Ph.: 09818880252

Email Id: cs\_sushant@yahoo.co.in

---

## SECRETARIAL COMPLIANCE REPORT OF M/S. BASANT INDIA LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021

We M/s. S. K. HOTA AND ASSOCIATES, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by M/S. **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 certification, for the year ended 31<sup>st</sup> March, 2020 ("Review Period") in respect of compliance with the provisions of :

(a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and

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

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

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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;

(i) Securities and Exchange Board of India (Depository Participant) Regulations, 2018 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:-

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	SEBI CIRCULAR NO CIR/ISD/3/2011-100% Promoters Holding are to be in dematerialized Form	Promoters holding is not in Demat Form	The Company has not complied the circular.

(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.
NA	NA	NA	NA	NA

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended on 31 <sup>st</sup> March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	SEBI CIRCULAR NO CIR/ISD/3/2011-100% Promoters Holding are to be in	Promoters holding is not in Demat Form	The company has not taken any corrective steps for the same.	The Company is yet to comply with the Circular.



dematerialized Form			
---------------------	--	--	--

(e) The Company has complied with the provision of Para 6(A) and 6(B) of SEBI Circular No.CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019 and the terms of appointment of the statutory auditor of the Company have been suitably modified to give effect to aforesaid circular.

**PLACE: NEW DELHI**

**DATE: 27/05/2021**

**FOR S. K. HOTA & ASSOCIATES  
COMPANY SECRETARIES**



A handwritten signature in blue ink, appearing to read 'Susanta Kumar Hota', written over a horizontal line.

**MR. SUSANTA KUMAR HOTA**

**MEMBERSHIP NO.: 16165**

**C P NO.: 6425**

**(UDIN: A016165C000381332)**