

BAHADUR CHAND INVESTMENTS PRIVATE LIMITED

Regd. Office: The Grand Plaza, Plot No. 2, Nelson Mandela Road, Vasant Kunj – Phase – II, New Delhi –110 070

Correspondence Address: 37, Community Center, Basant Lok, Vasant Vihar, New Delhi – 110 057

Phone: 011 – 47619310; Fax: 011 – 26152453; Website: www.bahadurchandinvestments.com

e-mail: info.bcipl@gmail.com; CIN: U65921DL1979PTC331322; PAN: AAACB6706F

May 22, 2024

Asst. Vice President, Listing Deptt.

National Stock Exchange of India Ltd.

Exchange Plaza, Plot C-1, Block G,

Bandra Kurla Complex,

Bandra (E),

Mumbai - 400 051

Sub: Annual Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sirs,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report for the Financial Year ended March 31, 2024.

Kindly take the same on your records.

Thanking you,

For **Bahadur Chand Investments Private Limited**

Ankit Sharma

Company Secretary & Chief Compliance Officer

Membership No. A66940

Address: The Grand Plaza, Plot No.2,

Nelson Mandela Road,

Vasat Kunj - Phase-II, New Delhi – 110070



V. HARI & CO.

COMPANY SECRETARIES

HEAD OFFICE

29, VAISHALI,
PITAMPURA,
DELHI-110034.

**Annual Secretarial Compliance Report of Bahadur Chand Investments
Private Limited for the year ended 31st March, 2024**

**[In compliance with Regulation 24A of the Securities and Exchange Board of India (Listing
Obligations and Disclosures Requirements) Regulations 2015]**

I, Varanasi Hari, Proprietor of V. HARI & Co., Company Secretaries, have examined:

- (a) all the documents and records made available to me and explanations provided by **Bahadur Chand Investments Private Limited-CIN-U65921DL1979PTC331322**-(“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (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 (LODR Regulations);
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not applicable to the Company during review period);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Not applicable to the Company during review period);
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018 (Not applicable to the Company during review period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (Not applicable to the Company during the review period);
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;



(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and circulars / guidelines issued thereunder (Not applicable to the Company during the review period);

and based on the above examination, I 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)	Regulation/ Circular No.	Deviations	Action taken by	Type of Action	Details of Violation	Fine amount	Observations/ remarks of the Practicing Company Secretary	Management Response	Remarks
Not Applicable										

b) The listed entity has taken 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	Remarks
Not Applicable										

The Company is a 'high value debt listed entity' as defined under the provisions of the LODR, which is effective from 07.09.2021. Regulation 16 to Regulation 27 of the LODR are applicable on the Company on a 'comply or explain' basis until March 31, 2024.

I further report that in terms of the circulars issued by the National Stock Exchange of India Limited on March 16, 2023, I also affirm the following:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS
1.	Secretarial Standard The company has complied with the applicable Secretarial Standards issued by the Institute of Company Secretaries of India (ICSI)	Yes	None
2.	Adoption and timely updation of the	Yes	None



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	<p>Policies</p> <p>All policies as mandatory under SEBI Regulations are adopted. The Policies are renewed on timely basis as per legal requirement</p>		
3.	<p>Maintenance and disclosure on Website</p> <p>The Company is maintaining functional website. Separate section has been maintained on the website for dissemination of the documents/information.</p>	Yes	None
4.	<p>Disqualification of Director:</p> <p>None of the Directors of the Company are disqualified under Section 164 of the Companies Act, 2013.</p>	Yes	None
5.	<p>To examine details related to Subsidiaries of listed entities:</p> <ul style="list-style-type: none"> - Identification of material subsidiary companies - Requirements with respect to disclosure of material as well as other subsidiaries 	Yes	<p>No material subsidiary is there.</p> <p>Disclosure requirements have been complied with.</p>
6.	<p>Preservation of documents:</p> <p>The Company is preserving the documents as per SEBI Regulations.</p>	Yes	None
7.	<p>Performance Evaluation:</p> <p>The requirement was on "Comply or Explain" basis till 31st March, 2024</p>	NA	None
8.	<p>Related Party Transactions:</p> <ul style="list-style-type: none"> - The Company has obtained prior approval of Audit Committee for all Related Party Transactions. - In case no prior approval is obtained, the Company shall provide detailed reasons along with confirmation whether the transactions were subsequently approved / ratified / rejected by the Audit Committee 	<p>Yes</p> <p>NA</p>	Prior approval of Audit Committee is taken for all Related Party Transactions.
9.	<p>Disclosure of events or information:</p> <p>The Company has provided all the required disclosures under SEBI (LODR) Regulations, 2015</p>	Yes	None



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10.	Prohibition of Insider Trading: The Company is in compliance with Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015	Not Applicable	PIT Regulations are not applicable.
11.	Actions taken by SEBI or Stock Exchange(s), if any: No actions taken against the Company/ 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	Yes	None
12.	Additions non-compliance, if any: No any additional non-compliance observed for all SEBI Regulations / Circular / Guidelines	Yes	None

For V. Hari & Co.
Company Secretaries

V. Hari

Varanasi Hari

Proprietor

CP No.: 8244 / FCS No.: 3552

Peer Review (PR) No. 3384/2023.

UDIN; F003552F000390620

Place : New Delhi
Date: 17TH MAY, 2024.



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