

BHAGYANAGAR INDIA LIMITED

ISO 9001 - 2008 Certified Company

Registered Office : 5th Floor, Surya Towers, Sardar Patel Road, Secunderabad-500 003. Telangana, India Tel :+91 40 27845119/27841198/44665700 Fax : +-91-40-27848851/27818868 Website : www.bhagyanagarindia.com E.mail : bil@surana.com CIN No.: L27201TG1985PLC012449

BIL/SECT/01/2021-22

Date: 4th May, 2021

The Secretary,	The Secretary,
National Stock Exchange of India Ltd.,	BSE Limited,
Exchange Plaza, C-1, Block G,	Phiroze Jeejeebhoy Towers,
Bandra Kurla Complex, Bandra (E),	Dalal Street,
Mumbai- 400 051	Mumbai- 400 001
Scrip Code: BHAGYANGR	Scrip Code: 512296

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2021

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read along with clause 3(b)(iii) of the SEBI Circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we are enclosing herewith an Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2021.

Kindly take the same on record.

Thanking you,

Yours truly, For Bhagyanagar India Limited Sec'bad feet Bhattachariee Subha

Company Secretary & Compliance Officer

Encl: As above.





Secretarial Compliance Report of Bhagyanagar India Limited for the year ended 31st March, 2021

(Pursuant to SEBI- CIR/CFD/CMD/1127/2019, Dated 8th February, 2019)

I, Rakhi Agarwal, Practicing Company Secretary, (FCS No.7047, Certificate of Practice No. 6270) have examined:

- (a) all the documents and records made available to me and explanation provided by M/s. Bhagyanagar 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 31st March, 2021 ("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 to the Company as there was no reportable event during the audit period)
- (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 to the Company as there was no reportable event during the audit period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 20 14; (Not applicable to the Company as there was no reportable event during the audit period)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company as there was no reportable event during the audit period)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the Company as there was no reportable event during the audit period)
- (h) Securities and Exchange Board of India (Prohibition of insider Trading) Regulations, 2015;

(i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; and circulars/ guidelines issued thereunder;

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)	Deviations	Observations/ Remarks of the Practicing Company Secretary			
None						

- (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
None				

(d) The listed entity has taken the following actions to comply with the observations made in previous reports – Not applicable as no observations were made in the previous report.

(e) During the year under review no appointment/ re-appointment/ resignation of statutory auditor of the Company had occurred. Further the terms of appointment of its existing statutory auditor has been modified in accordance with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019. In this regard, we report that the Company has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

RAKHI AGARWA

Rakhi Agarwal Practicing Company Secretary FCS No.:7047 CP No.: 6270 UDIN: F007047C000236309

Date: 04/05/2021 Place: Hyderabad