

# BALGOPAL COMMERCIAL LIMITED

(FORMERLY KNOWN AS BOMBINOO COMMERCIAL CO LIMITED)

CIN: L51109WB1982PLC035193

Ph - 033-65020273

23, Pollock Street, Chamber  
No-8, 1st Floor, Kolkata- 700 001

Website: [www.bcommercial.org](http://www.bcommercial.org)  
email id: [info@bcommercial.org](mailto:info@bcommercial.org)

Date: 11<sup>th</sup> June, 2021

To  
The Department of Corporate Services,  
BSE Limited,  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai- 400001

Scrip Code: 539834

Respected Sir/Madam,

Subject: Secretarial Compliance Report for the year ended 31st March 2021

## Annual Secretarial Compliance Report

We enclose, in terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, the Secretarial Compliance Report of the Company from MS Rekha Agarwal, Practicing Company Secretary, for the financial year ended 31st March, 2021.

This is for your information and records.

Yours faithfully,  
For Balgopal Commercial Limited

*Y Saraogi*

Yash Saraogi  
Director  
DIN: 00402101

**SECRETARIAL COMPLIANCE REPORT OF BALGOPAL COMMERCIAL  
LIMITED FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2021**

I, Rekha Agarwal, Practicing Company Secretary, have examined:

- a. all the documents and records made available to us and explanations provided by **M/s Balgopal Commercial Limited** ("Listed Entity"),
- b. the filings/submissions made by Listed Entity to the stock exchanges,
- c. website of 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, 2021 ('Review Period') in respect of compliance with the provisions of:
  - the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
  - 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- Securities and Exchange Board of India (Share Based employee benefits) Regulations, 2014
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not applicable to the Company during the Review Period)



ACS REKHA AGARWAL

AD-173, Salt Lake City,  
Sector -1 Kolkata – 700 064

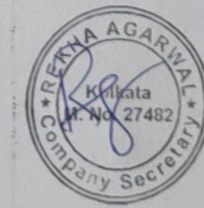
Phone: 9883276567  
Email: [acsrekha@gmail.com](mailto:acsrekha@gmail.com)

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- Securities and Exchange Board of India (Buyback of Securities) Regulations 2018 (Not applicable to the Company during the Review Period)
  - Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the Company during the Review Period);
  - Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 (Not applicable to the Company during the Review Period)
  - Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
  - Securities and Exchange Board of India (Registrar to an issue and Share Transfer Agents) Regulations. 1993 (Not applicable to the Company during the Review

and circulars/guidelines issued thereunder.

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 there under.
- b. The Listed Entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under in so far as it appears from our examination of those records on sample basis.
- c. There were no 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 there under.



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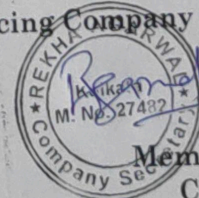
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d. The Listed Entity has taken the following actions to comply with the observations made in previous reports:

S/N	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year end (The years to be mentioned)	Action taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on action taken by the Listed Entity
1	Non- appointment of qualified Company Secretary as Compliance Officer under Regulation 6(1) of SEBI LODR, Regulations, 2015	2019-2020	Company Secretary was appointed and fine of Rs 24,780 was paid by the Company	OK
2	Non- compliance with the composition of audit committee as per Corporate Governance Report filed for the quarter ended 31-12-2019	2019-2020	Company has done revised filing of the said report and requested BSE to waive off the penalty of Rs 1,81,720 as it was a technical error. Penalty was withdrawn by BSE vide their mail dated 12-01-2021	OK

For Rekha Agarwal  
Practicing Company Secretary



Place: Kolkata  
Date: 07.06.2021

Mem No. 27482  
CP No: 9812  
UDIN: A027482C000429281