

**SECRETARIAL COMPLIANCE REPORT OF BURNPUR CEMENT LIMITED FOR THE
YEAR ENDED 31ST MARCH, 2022**

I, Rajesh Ghorawat, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to me and explanation provided by **Burnpur Cement 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, 2022 ("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 there under, have been examined *to the extent of Acts / provisions of the Acts applicable to Company*, 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 (Registrars to an Issue and Share Transfer Agents) Regulations, 1993

and circulars/ guidelines issued thereunder;

RAJESH GHORAWAT

PRACTISING COMPANY SECRETARY

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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
NIL			

- (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 my 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 there under:

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
NIL				

- (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 31 st March, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Regulation 29(2)/(3) of SEBI (LODR) Regulations, 2015 (Prior intimation to Stock Exchanges regarding Board Meeting) (June, 2020 Qtr)	Delay in submitting to NSE required prior intimation of Board Meeting convened on 14 th August, 2020.	The company replied to NSE stating its reasons for delay in such intimation but the exchange did not accept the reason and asked the	NIL

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			company to pay the fine. The company finally paid the fine imposed by the exchange.	
2.	Regulation 29(2)/(3) of SEBI (LODR) Regulations, 2015 (Prior intimation to Stock Exchanges regarding Board Meeting) (June, 2020 Qtr)	Delay in submitting to BSE required prior intimation of Board Meeting convened on 14th August, 2020.	The company received email on 10.09.20 and replied to BSE on 14 th September, 2020 stating its reasons for delay in such intimation. There was no further notice or communication received from BSE.	NIL



Rajesh Ghorawat
Practising Company Secretary
M.No. F7226
CP No. 20897

Date: 14th May, 2022
Place: Kolkata

ICSI Peer Review No.: 1992/2022
UDIN: F007226D000322376