

BHARAT AGRI FERT & REALTY LTD.

Manufacturers : Single Superphosphate (Powder & Granulated)
Registered Off. : 301, Hubtown Solaris, N.S. Phadke Marg, Andheri (E), Mumbai - 400 069.
Tel. : 6198 0100 / 2682 0490 Fax : 2682 0498 E-mail : bfilshivisai@gmail.com
Factory & Resort : Kharivali Village, Tal.: Wada, Dist.: Palghar, Maharashtra Pin. 421303.
www.bharatrealty.co.in / www.anchaviyo.com E-mail : bfil1318@yahoo.in / bfil1318@gmail.com
CIN - L24100MH1985PLC036547



30th May, 2022

To,
The Secretary,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001.

Security ID: BHARATAGRI

Security Code: 531862

Dear Sir/ Ma' am,


Sub: Annual Secretarial Compliance Report of Bharat Agri Fert & Realty Limited (the "Company") for the financial year ended 31st March, 2022

In compliance with the Securities and Exchange Board of India Circular No. CIR/CFD/CMDI/27 /2019 dated 8th February, 2019, please find enclosed copy of the Annual Secretarial Compliance Report of the Company, dated 30th May, 2022, for the financial year ended 31st March, 2022, certified by Mr. Prabhat Maheshwari, Partner, GMJ and Associates, Company Secretaries.

We request you to kindly take the above on record.

Thanking you,

For Bharat Agri Fert & Realty Limited


Yogendra D. Patel
Chairman and Mg. Director
DIN: 00106864



**SECRETARIAL COMPLIANCE REPORT OF BHARAT AGRI FERT & REALTY
LIMITED FOR THE YEAR ENDED 31ST MARCH, 2022**

To,
The Members,
Bharat Agri Fert & Realty Limited
301, 3rd Floor, Hubtown Solaris,
N S Phadke Marg, Near Gokhale Bridge,
Andheri (East),
Mumbai - 400 069.

We, **GMJ & Associates, Practicing Company Secretaries** have examined:

- a) all the documents and records made available to us and explanations provided by **Bharat Agri Fert & Realty Limited** ("the listed entity") bearing CIN: L24100MH1985PLC036547,
- 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");

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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 during the review period);**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018 **(Not applicable to the company during the review period);**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;**(Not applicable to the company during the review period);**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the company during the review 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 during the review period);**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- j) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;

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
NIL			



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- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from 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
1.	Bombay Stock Exchange Limited (BSE Ltd)	Regulation 33 - Non-submission of the financial results within the period prescribed	<p>The company had inadvertently failed to attach the Statement of Impact of Audit Qualification of Consolidated Annual Financial Statements in the Financials results uploaded on the BSE website.</p> <p>Bombay Stock Exchange Limited has levied a fine of Rs. 23,600/- against the company (inclusive of GST) against non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 for the quarter ended 31st March, 2021 (4 days i.e. upto 4th July, 2021).</p>	<p>The Company has submitted its response dated 30th July, 2021 and requested to waive off the fine due to human inadvertence, the company has failed to attach the Statement of Impact of Audit Qualification of Consolidated Annual Financial Statements in the Financials results uploaded on the BSE website for the quarter ended 31st March, 2021 uploaded on 30th June, 2021 and subsequently filed the correct Financial results on 4th July, 2021.</p> <p>However, the BSE Ltd vide email dated 17th January, 2022 had taken up the representation of the Company before the "Internal Committee for Fine Waiver" and waived off the fine to be paid. Since the Company had already made the payment, the same was adjusted with the Annual Listing fees paid for the financial year 2022-23.</p>



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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
2.	Bombay Stock Exchange Limited (BSE Ltd)	Regulation 24A – Non submission of Secretarial Compliance report	Bombay Stock Exchange Limited has levied a fine of Rs. 11,800/- against the company (inclusive of GST) against non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 for the quarter ended 31 st March, 2021 (4 days i.e. upto 4 th July, 2021).	The Company has paid fine as levied by Bombay Stock Exchange Limited and has placed the same before the Board of Directors at their next meeting.

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
Not Applicable				

For GMJ & ASSOCIATES
Company Secretaries

Prabhat Maheshwari

[CS PRABHAT MAHESHWARI]

PARTNER

M. No. : FCS 2405

COP No.: 1432

UDIN : F002405D000429293



PLACE: MUMBAI

DATE : 30TH MAY, 2022