



SHRI BAJRANG ALLIANCE LIMITED

Regd & Works Office : 521/C, Urla Industrial Complex, Urla, Raipur 493221 (C.G.), India
Phone : +91-771-4288000, Fax : +91-771-4288001
E-Mail : sales.sbal@goeltmt.com, Website : www.sbal.co.in

Addl. Place of Business : Kh. No. 521/58, Dharsiwa-Tilda Road, Vill.-Tandwa, Tehsil-Tilda,
Dist.-Raipur 493116 (C.G.)

CIN No. : L27103CT1990PLC005964



Dated: 23.05.2024

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
MUMBAI – 400001

Ref: BSE Scrip Code- 526981

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended 31st March, 2024, issued by M/s Anand Kumar Sahu & Associates, Practicing Company Secretaries, under Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements), Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019,

We are enclosing the copy of the same for your record please.

Thanking you

Yours faithfully
For, Shri Bajrang Alliance Limited

(Anshu Dubey)
Company Secretary & Compliance Officer



Encl: As above

Anand Kumar Sahu
B.Com., L.L.B., F.C.S.

Anand Kumar Sahu & Associates
Company Secretaries
(A Peer Reviewed Unit)

Off.: "BHARAT-BHAWAN" B-11, Sector 2,
Agroha Colony, Raipura, Raipur (C.G.)
Phone: 0771-4331144 (O) 98271-56855(M)
Email : sahuanand25@yahoo.co.in

To,
The Board of Directors
Shri Bajrang Alliance Limited
CIN (L27103CT1990PLC005964)
521/C, Urla Industrial Complex,
Urla, Raipur (C.G.)-493221

**Secretarial Compliance Report of Shri Bajrang Alliance Limited for the
financial year ended 31st March, 2024**

I, Anand Kumar Sahu, Proprietor of Anand Kumar Sahu & Associates,
Company Secretaries in Practice, have examined:

- (a) all the documents and records made available to us and explanation provided by **Shri Bajrang Alliance 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 financial 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; as amended;
- (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 as amended; **Not applicable to the Company during the Review Period;**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not applicable to the Company during the 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; **Not applicable to the Company during the Review Period;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended;

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
1	17	Regulation 17 (1), SEBI (LODR) 2015	Non-compliance of Regulation 17 (1), SEBI (LODR) 2015	-	-	Non-compliance with the Composition of the Board that Half of the Board is not Independent.	-	Refer Note 1	Refer Note 1	Based on the response of the management we will review again while reporting next year and report accordingly.

Observations/ Remarks of the Practicing Company Secretary:

The Company has appointed Additional Director on 04/03/2024, since Chairperson of Board is Executive, hence the strength of the Independent Director is less than half of the Board.

Management Response:

The Company submit that despite its best efforts to appoint an independent director as mandated, it could not complete the process due to short time, eventually the inadvertent discrepancy in the composition resulted in as on 31st March 2024. The Company submit that it will take appropriate action to rectify the deviation.

In view of the above and in due consideration of the sound track record of the company, it should not be held liable for payment of penalty.

(b) The listed entity has taken the following actions to comply with the observations made in previous reports: **There was no observation made in previous report for the financial year ended March 31, 2023.**



I further report that during the review period there was no event of appointment/reappointment/ resignation of statutory auditor of the Company and the Company was in compliance with para 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD/114/2019 dated 18th October, 2019.

I also report that, during the review period the compliance status of the listed entity is appended as below;

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<p><u>Secretarial Standards:</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).</p>	Yes	Nil
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <p>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</p> <p>All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI.</p>	Yes Yes	Nil Nil
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> ● The Listed entity is maintaining a functional Website. ● Timely dissemination of the documents/ information under a separate section on the website. ● Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/section of the website. 	Yes Yes Yes	Nil Nil Nil



4.	<u>Disqualification of Director:</u> None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Nil
5.	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries.	NA Yes	The Company does not have any material subsidiary and the Company has complied with the requirement with respect to other subsidiaries
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	Nil
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	Nil
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes Not Applicable	Nil Nil



9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	Nil
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Nil
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No action(s) has been taken against the listed entity/ 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 except as provided under separate paragraph herein (**).	No	
12.	<u>Additional Non-compliances, if any:</u> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	Nil

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. My responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity

Date: 15th April, 2024
Place: Raipur



For, Anand Kumar Sahu & Associates
Companies Secretaries

(Anand Sahu)
Proprietor

FCS No. 7670, CP No. 6023
UDIN: F007670F000126382
PR No. 1084/2021