



**Secretarial compliance report of Bharat Parenterals
Limited for the year ended on 31st March, 2021**

To,
The Board of Directors,
Bharat Parenterals Limited,
Survey No.144 & 146,
Jarod Samlaya Road,
Vill. Haripura, Ta. Savli,
Vadodara, Gujarat, 391520

I, Jigar Trivedi proprietor of Jigar Trivedi & Co., have examined:

- a) all the documents and records made available to us and explanation provided by Bharat Parenterals Limited
- b) the filings/ submissions made by the listed entity to the stock exchanges, (c) website of the listed entity,
- 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 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 during the review period)
- 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; (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;

and circulars/ guidelines issued there under;

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 there under, except as mentioned in clause (c) below.
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar 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
1	BSE Limited	Non compliance with the requirements pertaining to the composition of board of directors under Reg 17(1) of SEBI (LODR)	Fine for the quarter ended on June, 2020	As informed to us, the company had clarified its stand vide letter dated 26 th November, 2020 to BSE Limited regarding compliance of the applicable regulations and hence, the penalty imposed liable to be withdrawn.
2.	BSE Limited	Non compliance with the requirements pertaining to the composition of board of directors under Reg 17(1) of SEBI (LODR)	Fine for the quarter ended on September, 2020	The company has not paid fine amount, as the reply /confirmation from the BSE Limited is awaited.
3.	BSE Limited	Non compliance with the requirements pertaining to the composition of board of directors under Reg 17(1) of SEBI (LODR)	Fine for the quarter ended on December, 2020	

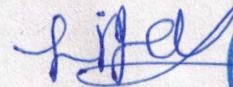


(d) The listed entity has taken the following actions to comply with the observations made in previous reports i.e. for the year ended 31st March, 2020:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 March, 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

Date: 21/06/2021
Place: Ahmedabad

For, Jigar Trivedi & Co.,



(Jigar Trivedi)
Company Secretaries
M. No.- 46488,
COP-18483



UDIN: A046488C000492516