

# BASANT INDIA LIMITED

(RBI Approved Gold Loan Company-COR 14.00859)

CIN: L51909DL1985PLC021396

Date: 30.05.2025

To,

The Listing Department  
**Metropolitan Stock Exchange of India Limited**  
Building A, Unit 205A, 2nd Floor,  
Piramal Agastya Corporate Park,  
L.B.S Road, Kurla West,  
Mumbai - 400 070

**CODE: BASANT**

**SUB: Submission of Secretarial Compliance Report for the Financial Year 2024-25 as per Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Dear Sir/ Madam,

Pursuant to the Regulation 24A of the SEBI (Listing Obligations and disclosure Requirements) Regulations, 2015, we enclose herewith Annual Secretarial Compliance Report for the financial year ended on 31<sup>st</sup> March 2025 issued by M/s Ankit Umesh Gupta & Associates.

We request you to kindly take the same on your record.

Thanking You.

Yours faithfully,

For **BASANT INDIA LIMITED**

**Sonica Bambi**  
(Company Secretary cum Compliance Officer)



**Encl.: As mentioned above**



## ANKIT UMESH GUPTA & ASSOCIATES

Company Secretaries

Head Office- WE 26/27, Mohan Garden, Dwarka Mod, ND-59

Branch Off- Shop No-2, Dwarka Sector Pocket-1A

Email Compliancecorporate4@gmail.com

Mobile No-7532046320/ 8178780168

Secretarial Compliance Report of **BASANT INDIA LIMITED** for the financial year ended 31ST March,2025

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **BASANT INDIA LIMITED** (hereinafter referred as 'the listed entity'), having its Registered Office at 912 INDRA PRAKASH BUILDING, 21 BARAKHAMBA ROAD NEW DELHI-110001 Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March,2025 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We have examined:

- (a) all the documents and records made available to us and explanation provided by Basant India 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 report, for the financial year ended 31st March,2025 ("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:-

- Based on the above examination, I/We hereby report that, during the Review Period:

- | 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	Regulation NO-6 of SEBI (LODR) Regulation, 2015 which states that Listed entity shall appoint Qualified Company Secretary as compliance officer	Regulation -6	Compliance officer was resigned from company resigned on 29 <sup>th</sup> Oct, 2023 and new company secretary named as Mrs. Bhartee Srivastava was appointed on 29 <sup>th</sup> June, 2024 who also resigned from 11 <sup>th</sup> Nov, 2024 and another company secretary named as Ms. Sonica Bambi was appointed on 10 <sup>th</sup> Feb, 2025.	-	-	-	-	There is no company secretary in the company between 30-10-2023 to 28-06-24.	Since the resignation of CS we are searching for suitable candidates but not found the same. As we have selected the candidate profile the same was appointed on 29-06-24.	Acknowledged
2	SEBI circular No CIR/ISD/3/2011 which states that 100% promoters sharehol	SEBI CIRCULAR NO- CIR/ISD/3/2011	100% promoters shareholding is not in demat form	-	-	-	-	Out of total shareholding of promoter only 35lakh shares are in dematerialized form.	Company is in process to dematerialize the promoters shareholdings.	Acknowledged

	ding must be in Demat form									
3	SEBI (PIT) Regulations, 2015	Regulation 3(5)	Instead of SDD software company is preferring Excel sheet for storing data	-	-	-	-	Data of all UPSI had been stored in password protected excel sheet also SDD certificate from the company was not filed for all quarter in the review period.	Company has purchased and installed the SDD software in May, 2025.	Acknowledged.
4	SEBI (PIT) Regulations, 2015	Regulation - 9	Closure of trading window was not filed for quarter ending June-24.					It was not filed for only first quarter.	It was left at due to casual vacancy in the office of compliance officer. we will file it at the earliest.	Acknowledge
5	SEBI (LODR) Regulations, 2015	Regulation 46						Website was not functional and maintained. Data was not uploaded anywhere	Company is taking appropriate steps to take the website functional	Acknowledged.

									nal and data will be upload ed soon.	
6	SEBI (LODR) Regulati ons , 2015	Regulat ion 33						Audited Financials for last quarter i.e 31-03- 2024 was filled late i.e after 60 days on 08-06- 2024 due to resignatio n of auditor.	As audito r had resign ed on the basis of medica l conditi on due to which report was not issued on time.	Ackno wledg e
7	SEBI (LODR) Regulati ons, 2015	Regulat ion 24(A)						Annual Secretaria l Complian ce Report was filed after 30- 05-2024.	Due to non- availab e ility of compli ance officer record s were not provid ed timely after appoin tment record s were provid ed immed iately and report taken.	Ackno wledg e

8	SEBI (LODR) Regulations, 2015	Regulation 27(2)						Corporate Governance Report for last quarter was not filed and for third quarter it was delayed by two days.	For third quarter it was filed late by only 2 days due to technical error on website. Though we have filed through mail it was not recognized by exchange and also we have now compounded the same by paying penalty amount for the late filing due to some technical issue and we will file all	Acknowledgement
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	including specific clause)							Company Secretary		
1	SEBI circular No CIR/ISD/3/2011 which states that 100% promoter's shareholding must be in Demat form	SEBI CIRCULAR NO-CIR/ISD/3/2011	-	-	-	-	-	No new shares of promoters which held in physical form is converted into demat	Company in process to make all promoters shareholding in demat form	Acknowledge.
2	SEBI (PIT) Regulations, 2015	Regulation 3(5)	Instead of SDD software company is preferring Excel sheet for storing data	-	-	-	-	No action taken to purchase SDD software in the period under review but in May, 2025 SDD software is	We had now installed the SDD software effective from May, 2025.	Acknowledge

								install ed.		
3	Regulation NO-6 of SEBI (LODR) Regulation, 2015 which states that Listed entity shall appoint Qualified Company Secretary as compliance officer	Regulation -6	Company Secretary had been resigned from company since 29-10-23	-	-	-	-	There was no Company Secretary in the company between 30-10-2023 to 28-06-2024 on 29-06-2024 company secretary cum compliance officer was appointed.	Since the resignation of CS we are searching for suitable candidate but not found the same however we have appointed compliance officer from 29-06-24.	Acknowledged

II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/	Observations/ Remarks by PCS*
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		NA)	
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	<p>NA</p> <p>NA</p> <p>NO</p>	Auditor who has resigned not provided audit report or limited review for the period under review as resignation was due to medical condition.
2.	Other conditions relating to resignation of statutory auditor		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:		

	<p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p>	NA	There is no material subsidiary of the company.
	<p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the</p>	YES	

Sr. No.	Particular s	Compliance Status (Yes/No/ NA)	Observation s/ Remarks by PCS*
	<p>proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>	<p>NA</p> <p>NA</p> <p>NA</p>	
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	NO	Resignation letter was not as per format.

III. we hereby 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.	Secretarial Standards:  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), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	NO	Secretarial Standards were not followed properly during the period of casual vacancy in the office of Compliance Officer.

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	<p>YES</p> <p>YES</p>	No remarks.
3.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/ information under a separate section on the website</li> <li>• 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</li> </ul>	<p>NO</p> <p>NO</p> <p>NO</p>	Website was not functional during the period under review no statutory uploading was done.
4.	<p>Disqualification of Director:</p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	YES	

5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	NA	There is no subsidiary of the company
6.	<p>Preservation of Documents:</p> <p>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.</p>	YES	Records were maintained at the best possible way it could be managed.



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
7.	<p>Performance Evaluation:</p> <p>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.</p>	YES	No remarks
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(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.</p>	<p>YES</p> <p>NA</p>	
9.	<p>Disclosure of events or information:</p> <p>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.</p>	YES	As per the document provided by Management and information available on portal this regulation is complied.
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	YES	

11.	Actions taken by SEBI or Stock Exchange(s), if any: 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 (**).	YES	During the period under a penalty of Rupees 4720/- was imposed on company due to late filling of Corporate Governance report for third quarter.
12.	Additional Non-compliances, if any:  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	YES	No Remarks

**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. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We 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.

Place: New Delhi

Date:30-05-2025

FOR ANKIT UMESH GUPTA & ASSOCIATES

**Ankit Gupta**  
Digitally signed by Ankit Gupta  
Date: 2025.05.30 16:36:37 +05'30'

CS ANKIT GUPTA

ACS – A69928 COP- 26224

UDIN:**A069928G000510126**

PR No: 6606/2025





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