

May 01, 2021

National Stock Exchange of India Ltd.,

Exchange Plaza, C-1 Block G, Bandra Kurla Complex Bandra [E], Mumbai – 400051

BSE Limited,

Phiroze Jeejeebhoy Towers.

Dalal Street, Fort, Mumbai - 400 001 Metropolitan Stock Exchange of India Ltd.,

Vibgyor Towers, 4 th Floor, Plot No. C62, G - Block, Opp. Trident Hotel, Bandra Kurla, Complex, Bandra (E), Mumbai

CIN No.: L51909DL1983PLC016907

- 400098

NSE Scrip Symbol: BLS

BSE Scrip Code: 540073

MSE Scrip Symbol: BLS

Subject: Submission of Annual Secretarial Compliance Report for the year ended 31st March 2021.

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed Annual Secretarial Compliance Report for the year ended 31st March 2021 issued by M/s. D. K. Chawla & Co., Practicing Company Secretaries.

You are requested to take the same on your records.

For BLS International Services Limited

..... Dharak A. Mehta **Company Secretary and Compliance Officer** ICSI Membership No.: ACS40502

Encl: as above

D.K. Chawla & Co.

(Company Secretaries)

Head off: H-2/1 Krishna Nagar, Delhi-51 Branch Off.No.-84,F.F, Amrit Plaza Complex, Surya Nagar, Ghaziabad

Uttar Pradesh-201011 Phn.:+0120-204142464

Mob: +91-9810492858, +91-8368488908 Email id:-dasvindersidhu@gmail.com dkchawlaandco@gmail.com



To
The Board of Directors
BLS International Services Limited
912, Indraprakash Building 21
Barakhamba Road, New Delhi-110001

Reg: Annual Secretarial Compliance Report for the Financial Year 2020-21

Sir

I have been engaged by BLS International Services Limited (hereinafter referred to as "the Company") whose equity shares are listed on National Stock Exchange of India Limited, BSE Limited and Metropolitan Stock Exchange of India Limited (MSE) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisos of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose, Annual Secretarial Compliance Report is enclosed.

For D.K. Chawla & Co. (Company Secretaries)

(CS Dasvinder Kaur) M. No.: 33095

COP: 15232 Date: 01st May, 2021 Place: Ghaziabad

D.K. Chawla & Co.

(Company Secretaries)

Head off: H-2/1 Krishna Nagar, Delhi-51 Branch Off.No.-84,F.F, Amrit Plaza Complex, Surya Nagar, Ghaziabad

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<u>Secretarial Compliance Report of BLS International Services Limited</u> for the year ended on 31st March, 2021

I, Dasvinder Kaur, proprietor of M/s D. K. Chawla & Co. have examined:

- (a) all the documents and records made available to us and explanation provided by the BLS International Services Limited,
- (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 on 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 (Substantial Acquisition of Shares and Takeovers) Regulations , 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations , 2015 as amended from time to time;
- (d) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations , 2018;

- (e) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents)
 Regulations, 1993 regarding the Companies Act and dealing with client;
- (f) Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999
- (g) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (h) The Securities and Exchange Board of India (Buy Back of Securities) Regulations, 2018;
- (i) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (j) The Securities and Exchange Board of India (Issue and Listing of Non-convertible and Redeemable Preference Shares) Regulations, 2013;
- (k) The Depositaries Act, 1996 and the Regulations and Bye-laws framed thereunder to the extent of Regulation 76 of Securities and Exchange Board of India (Depositaries And Participants) Regulations, 2018 to the extent applicable;

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:-

S. 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 thereunder 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 the SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

S. NO.	Action taken by	Details of Violation	Details of	action	Observations/remarks	
			taken E.g.	fines,	of the	Practicing
			warning	letter,	Company	Secretary, if
			debarment, etc.		any.	
NIL						

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **NOT APPLICABLE**

(Note:

- 1. Provide the list of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations.
- 2. Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised! Observations.)

Place: Ghaziabad D.K. Chawla & Co. Date: 01st May, 2021 (Company Secretaries)

(CS Dasvinder Kaur)
COP: 15232
M. No.: 33095
UDIN: A033095C000220436