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THE BOMBAY BURMAH TRADING CORPORATION, LIMITED

REGD. OFFICE : 9, WALLACE STREET, FORT,
MUMBAI 400 001, INDIA.

14th May, 2021

The Secretary
BSE Ltd.,
Phiroze Jeejeebhoy Towers,
Dalal Street,
MUMBAI 400 001.
Scrip Code: 501425

Manager – Listing Department,
National Stock Exchange of India Ltd.,
Exchange Plaza, 5th Floor,
Plot No.C/1, 'G' Block,
Bandra-Kurla Complex,
Bandra (E),
MUMBAI 400 051.
Scrip Code: BBTC

Dear Sirs,

Sub: Submission of Annual Secretarial Compliance Report for the year ended 31st March, 2021

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMDI/27/2019 dated 8th February 2019, please find enclosed copy of Annual Secretarial Compliance Report dated 13th May, 2021 for the financial year 2020-21 issued by Mr. Tushar Shridharani, Practicing Company Secretary and the Corporation's Secretarial Auditor.

Kindly take the same on record.

Thanking you,

Yours faithfully,
For The Bombay Burmah Trading Corporation, Limited

Sanjay Kumar Chowdhary
Company Secretary & Compliance Officer

Encl: As above

TUSHAR SHRIDHARANI

B. Com., LL.B., F.C.S.

Tel. : (022) 2208 5764 / 2208 5765
Email : tushar@tusharshri.com
Web. : www.tusharshri.com

10, New Marine Lines
417, Jolly Bhavan No. 1
Mumbai – 400 020

To,
The Board of Directors
The Bombay Burmah Trading Corporation, Limited
9, Wallace Street, Fort
Mumbai – 400 001

Dear Sir(s),

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

I have been engaged by The Bombay Burmah Trading Corporation, Limited (“**the Corporation**”), whose equity shares are listed on National Stock Exchange of India Limited and BSE Limited, to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI’s Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon for the year ended 31st March, 2021.

It is the responsibility of the management of the Corporation to maintain records, devise proper system 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.

My responsibility is to verify compliances by the Corporation with provisions of all applicable SEBI regulations and circulars / guidelines issued there under from time to time and issue a report thereon.

This 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.

Place: Mumbai
Date: 13th May, 2021

**TUSHAR
RAMESH
SHRIDHARANI**

Digitally signed by TUSHAR RAMESH SHRIDHARANI
DN: cn=, o=, email=tusharshri@tusharshri.com,
2.5.4.20=759760d8f96e28572408007e59feb1bc8b44
2b0266da513a13258d8ff454db7,
postalCode=400006, street=227 wallkeshwar road
mumbai,
serialNumber=cd26e169e32dc39cc3a0d907186dfe1
a2849f9f17eadab3e77459cd8580ca1e, ou=Private,
o=Personal, cn=TUSHAR RAMESH SHRIDHARANI
Date: 2021.05.13 11:16:04 +05'30'

(Tushar Shridharani)
Practicing Company Secretary
FCS: 2690 / COP: 2190
UDIN - F002690C000288140

Secretarial compliance report of The Bombay Burmah Trading Corporation, Limited for the year ended 31st March, 2021

I, Tushar Shridharani, have examined:

- (a) all the documents and records made available to us and explanation provided by The Bombay Burmah Trading Corporation 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 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;
 - (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;
 - (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;
 - (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
 - (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
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