



NEAPS- e-Uploading

BRL:2020-21/1
February 17, 2021.

Regd. Off. : 1501, Vikram Tower, Rajendra Place, New Delhi - 110008
Ph. : +91-11-43661111 (30 lines) • Fax : +91-11-43661100, 41538600
E-mail : info@bharatgroup.co.in • Website : www.bharatgroup.co.in
CIN : L24119DL1989PLC036264

To
National Stock Exchange of India Limited,
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra East, Mumbai – 400051

**Sub: Postal Ballot Results including Scrutiniser's Report for E-voting
for Postal Ballot of Bharat Rasayan Limited ("the Company") - BHARATRAS**

Dear Sir,

Please find attached the Postal Ballot Results including Scrutiniser's Report for E-voting for Postal Ballot pursuant to provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This is for your information and records.

The above information is also being made available on the website of the Company www.bharatgroup.co.in.

Thanking You,

Yours sincerely,
For **BHARAT RASAYAN LIMITED**


(NIKITA CHADHA)
Company Secretary &
Compliance Officer



Encl: As mentioned above

Email

CC:

To,
The Secretary
BSE Limited
PhirozeJeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 023

- For your information

Name of the Company	: BHARAT RASAYAN LIMITED
Date of AGM / EGM	: Not Applicable
Total Number of Shareholders on Cut-Off date (08.01.2021)	: 17124
Total Number of Shareholders present in the meeting:	: Not Applicable
- in Person or Proxy	
- Promoter and Promoter Group	
- Public	
No. of Shareholders attended the meeting through video:	: Not Applicable
- Promoter and Promoter Group	
- Public	

Resolution required (Ordinary / Special)	Special
Whether Promoter/Promoter Group are interested in the agenda/resolution?	Yes
Description of resolution considered	Approval for Buyback of Shares

Category	Mode of Voting	No. of Shares held	No. of Votes Polled	% of Votes polled on outstanding shares	No. of Votes – in Favour	No. of Votes – Against	% of Votes in favour on votes polled	% of Votes against on votes polled
Promoter and Promoter Group	e-Voting	3179204	3179204	100.000	3179204	Nil	100.000	Nil
	Polls		Nil	Nil	Nil	Nil	Nil	Nil
	Postal Ballot		Nil	Nil	Nil	Nil	Nil	Nil
	Total	3179204	3179204	100.000	3179204	Nil	100.000	Nil
Public Institution	e-Voting	37945*	37465	100.000	37465	Nil	100.000	Nil
	Polls		Nil	Nil	Nil	Nil	Nil	Nil
	Postal Ballot		Nil	Nil	Nil	Nil	Nil	Nil
	Total	37945	37465	100.000	37465	Nil	100.000	Nil
Public Non-Institution	e-Voting	2879	2879	100.000	2781	98	96.596	3.404
	Polls		Nil	Nil	Nil	Nil	Nil	Nil
	Postal Ballot		Nil	Nil	Nil	Nil	Nil	Nil
	Total	2879	2879	100.000	2781	98	96.596	3.404
Grand Total		3220028	3219548	100.000	3219450	98	99.997	0.003
WHETHER RESOLUTION IS PASSED OR NOT? (YES/NO)								YES

*Including 480 equity shares against which votes has been abstained.

For BHARAT RASAYAN LIMITED

Nikita Chadha

Company Secretary

NIKITA CHADHA
Company Secretary &
Compliance Officer

NEW DELHI
FEBRUARY 17, 2021.



HARSHDEEP NARULA & ASSOCIATES
Company Secretaries

FORM NO. MGT-13

REPORT OF SCRUTINIZER

[PURSUANT TO SECTION 108 & 109 OF THE COMPANIES ACT, 2013 READ WITH RULE 20 & RULE 21 OF THE COMPANIES (MANAGEMENT AND ADMINISTRATION) RULES, 2014]

TO
THE CHAIRMAN
M/S BHARAT RASAYAN LTD
1501, VIKRAM TOWER, RAJENDRA PLACE,
NEW DELHI – 110008

Dear Sir,

Subject: Scrutinizer's Report for "approval of buyback of equity shares of Bharat Rasayan Limited *"the company"*, through postal ballot by remote E-voting process, commenced from January 18, 2021 at 09:00 AM (IST) and ended on February 16, 2021 at 05:00 PM (IST)", conducted pursuant to provisions of section 108 of the Companies Act, 2013 read with rule 20 and rule 21 of the Companies (Management & Administration) rules 2014, as amended from time to time.

I, Harshdeep Singh Narula, Practicing Company Secretary, had been appointed as the Scrutinizer by the Board of Directors of Bharat Rasayan Limited *"the company"* vide their board resolution dated January 12, 2021, pursuant to Section 108 of the Companies Act, 2013 read with Rule 20 and Rule 21 of the Companies (Management and Administration) Rules, 2014, as amended from time to time, to conduct the counting of voting for postal ballot only through remote e-voting process in a fair and transparent manner, commenced between Monday, January 18, 2021 at 09:00 AM (IST) and ended on Tuesday, February 16, 2021 at 05:00 PM (IST).

I submit my report as under:

House No. Wz-9, Pratap Nagar, New Delhi – 110064, India
contact@harshdeepnarula.in
98780 67337



HARSHDEEP NARULA & ASSOCIATES

Company Secretaries

1. The Postal Ballot Notice was sent through email address with the Company / depository participant, only to those members, whose names appeared in the Register of Members / Beneficial Owners received from the Registrar and Share Transfer Agent, National Security Depository Limited (NSDL) and the Central Depository Services (India) Limited (CDSL), as on January 8, 2021 (Cut-off date), as mentioned in Postal Ballot Notice and Newspaper Publications, seeking approval of the members by way of special resolution for the buyback of 93,472 equity shares as set out in the Notice, in accordance with the provisions of Section 110 and other applicable provisions, if any, of the Companies Act, 2013 (the "Act"), Rules 20 and 22 of the Companies (Management and Administration) Rules, 2014, read with the General Circular No. 14/2020 dated April 08, 2020 read with General Circular No. 17/2020 dated April 13, 2020 read with the General Circular No. 22/2020 dated June 15, 2020 read with the General Circular No. 33/2020 dated September 28, 2020 read with Circular No. 39/2020 dated December 31, 2020, issued by The Ministry of Corporate Affairs, India.
2. Voting rights of the Members have been reckoned in proportion to their shares of the paid up equity share capital of the Company as on January 08, 2021.
3. 60 (Sixty) Members have casted their votes on the e-voting platform till the conclusion of voting Period.
4. Link Intime India Pvt Ltd (Link Intime) had been appointed by the Company to engage itself for the purpose of providing E-voting facility. The votes casted through e-voting up to 05:00 P.M., February 16, 2021, were completed and duly locked at 05:03 P.M. and were finalized at the same time. Further, a Final report was generated from Link Intime's portal at 05:06 P.M., February 16, 2021, in presence of two witnesses, residing at New Delhi, who are not in employment of the Company. After due validation of e-voting results and on the basis of final report generated through portal, we have prepared our report.
5. The management of the Company is responsible to ensure the compliance with the requirements of the relevant provisions of The Companies Act, 2013 and the Rules made there under and Secretarial Standard – 2 issued by The Institute of Company Secretaries of India, in respect of the resolution(s) contained in the Postal Ballot Notice.
6. According to provisions of section 108 of Companies Act, 2013, and rules made thereunder, the company has provide all the necessary support, technical and otherwise and in orderly i have

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conducted counting of the voting and of the result thereof.

7. My responsibility as a scrutinizer is restricted to making Scrutinizer's Report of the votes casted by the members for the resolutions contained in the Postal Ballot Notice dated January 12, 2021, based on the reports generated from the e-voting system provided by Link Intime, the authorized agency engaged by the Company to provide e-Voting facilities.

FOR HARSHDEEP NARULA AND ASSOCIATES

HARSHDEEP SINGH Digitally signed by
HARSHDEEP SINGH
Date: 2021.02.17
13:36:20 +05'30'

HARSHDEEP SINGH
MEMBERSHIP NO.: 56035
CERTIFICATE OF PRACTICE NO.: 20824

DATED: 17/02/2021
PLACE: NEW DELHI

UDIN: A056035B002973961

FOR BHARAT RASAYAN LIMITED

SAT NARAIN GUPTA Digitally signed by SAT NARAIN GUPTA
DN: c=IN, st=Delhi,
2.5.4.20=7f1e633ea33e2dd976e4116b1f12c
37eaa2caa761f3ddac0b5b8f1af3bdb102,
postalCode=110026, street=H.NO-7, EAST
AVENUE ROAD, EAST PUNJABI BAGH,
serialNumber=aa502b8370a6917e80ba723
81c725159abdbf80f00f90e7096476b23ba
31e, o=Personal, cn=SAT NARAIN GUPTA,
pseudonym=f9c9f3b25c5ba2ae951e92bc6e
10f4e8
Date: 2021.02.17 15:06:15 +05'30'

SAT NARAIN GUPTA
CHAIRMAN
DIN: 00024660

DATED: 17/02/2021
PLACE: NEW DELHI



HARSHDEEP NARULA & ASSOCIATES

Company Secretaries

ANNEXURE A

DETAILS & RESULT OF POSTAL BALLOT E - VOTING

On the basis of the data downloaded from official website of Link Intime, who had been appointed by the Company to engage itself for the purpose of providing E-voting facility, I submit herewith the report on e-Voting:

Item No. 1: Special Resolution - Approval for Buyback of Equity Shares

For Buyback of Equity Shares of the Company, subject to the approval of the shareholders of the Company by way of special resolution through postal ballot/e-voting and subject to such approvals of statutory, regulatory or governmental authorities as may be required under applicable laws.

i. Voted **in-favour** of the resolution:

Number of members voted	Number of votes casted by them
53	3219450

ii. Voted **against** the resolution:

Number of members voted	Number of votes casted by them
04	98

iii. **In-valid** votes:

Number of members voted	Number of votes casted by them
0	0

iv. **Abstain** votes:

Number of members voted	Number of votes casted by them
03	480



HARSHDEEP NARULA & ASSOCIATES

Company Secretaries

Note:

The Resolution stand passed under remote e-Voting through Postal Ballot with the requisite majority.

I further report that the Chairman or any other person as authorized may declare and confirm the above results of e-Voting.

I further report that Section 108 and Section 109 of Companies Act, 2013 read with Rule No. 20 and 21 of the Companies (Management and Administration) Rules, 2014, have been duly complied with.

The relevant records relating to e-Voting will be handed over to the Chairman for safe keeping after the Chairman approves and signs the minutes of the meeting.

I pay my sincere thanks to the management of the Company for giving me the opportunity to act the scrutinizer for the purpose of e-Voting for buyback through postal ballot.

Thanking You.
Yours faithfully,

FOR HARSHDEEP NARULA AND ASSOCIATES

HARSHDEEP SINGH
Digitally signed by
HARSHDEEP SINGH
Date: 2021.02.17
13:36:38 +05'30'

HARSHDEEP SINGH
MEMBERSHIP NO.: 56035
CERTIFICATE OF PRACTICE NO.: 20824

DATED: 17/02/2021
PLACE: NEW DELHI

UDIN: A056035B002973961

FOR BHARAT RASAYAN LIMITED

SAT NARAIN GUPTA
Digitally signed by SAT NARAIN GUPTA
DN: c=IN, st=Delhi,
2.5.4.20=7f1e633ea33e2ddf976e4116b1f12
c37eaa2caa761f3ddac0b5b8f1af3bdb102,
postalCode=110026, street=H.NO-7, EAST
AVENUE ROAD, EAST PUNJABI BAGH,
serialNumber=aa502b83700a691e80baf2
381c775159abdbf80fb00f90e7096476b23
ba31e, o=Personal, cn=SAT NARAIN GUPTA,
pseudonym=f9c9f3b25c8ba2ae951e92bc6
e10f4e8
Date: 2021.02.17 15:06:52 +05'30'

SAT NARAIN GUPTA
CHAIRMAN
DIN: 00024660

DATED: 17/02/2021
PLACE: NEW DELHI



HARSHDEEP NARULA & ASSOCIATES

Company Secretaries

Annexure B

Combined Results of the votes

Item No. 1: Special Resolution - Approval for Buyback of Equity Shares

For Buyback of Equity Shares of the Company, subject to the approval of the shareholders of the Company by way of special resolution through postal ballot/e-voting and subject to such approvals of statutory, regulatory or governmental authorities as may be required under applicable laws.

Resolution Required: (Ordinary / Special)				Special Resolution		
Whether promoter/ promoter group/ are interested in the agenda/ resolution:				No		
Mode of Voting				Postal Ballot Remote E-voting		
Category	No. of Members Voted	No. of Shares Held	No. of votes Cast	No. of Votes in favour	No. of Votes against	% of Votes in favour on votes polled
Promoter and Promoter Group	13	3179204	3179204	3179204	0	100
Public Institutions	10	37945	37465	37465	0	100
Public Non-Institutions	37	2879	2879	2781	98	96.596
TOTAL	60	3220028	3219548	3219450	98	99.997

**No of votes polled does not include 'no. of votes invalid' and 'no. of votes abstained'.*

House No. Wz-9, Pratap Nagar, New Delhi – 110064, India
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HARSHDEEP NARULA & ASSOCIATES
Company Secretaries

CC To:

NIKITA CHADHA "COMPANY SECRETARY"
M/S BHARAT RASAYAN LTD, 1501, VIKRAM TOWER,
RAJENDRA PLACE, NEW DELHI – 110008

LINK INTIME INDIA PVT. LIMITED "LINK INTIME"
C 101, 247 PARK, L.B.S.MARG, VIKHROLI (WEST),
MUMBAI - 400083

BOMBAY STOCK EXCHANGE LIMITED "BSE"
PHIROZE JEEJEBHOY TOWERS, DALAL STREET,
MUMBAI – 400 023

NATIONAL STOCK EXCHANGE OF INDIA LIMITED "NSE"
EXCHANGE PLAZA, 5TH FLOOR, PLOT NO. C-1 'G' BLOCK,
BANDRA-KURLA COMPLEX, BANDRA (E), MUMBAI - 400 051

CENTRAL DEPOSITORY SERVICES (INDIA) LIMITED "CDSL"
REGD. OFFICE: 17TH FLOOR, P J TOWERS, DALAL STREET,
MUMBAI – 400001

NATIONAL SECURITIES DEPOSITORY LIMITED "NSDL"
TRADE WORLD, A WING, 4TH FLOOR, KAMALA MILLS
COMPOUND, LOWER PAREL, MUMBAI - 400013

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