

BANCO PRODUCTS (INDIA) LIMITED

CIN : L51100GJ1961PLC001039

Post Box No. 2562, Vadodara - 390 005. Gujarat, India.

Phone : (0265) 2680220/21/22/23

E-mail : mail@bancoindia.com, Website : www.bancoindia.com

16th May, 2022

| | |
|--|--|
| To, BSE Limited Corporate Relationship Department, 1 st Floor, New Trading Ring, Rotunda Building, P. J. Towers, Dalal Street, Fort, Mumbai – 400 001 Stock Code (BSE) - 500039 | To, National Stock Exchange of India Ltd. Listing Department, “Exchange Plaza”, C/1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051 Trading Symbol (NSE) - BANCOINDIA |
|--|--|

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report for the Financial Year ended
31st March, 2022**

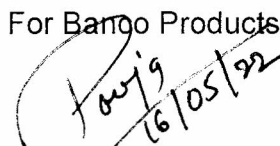
Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, please find enclosed herewith the Annual Secretarial Compliance Report issued by M/s. J.J. Gandhi & Co., Practicing Company Secretaries, for the financial year ended 31st March, 2022.

We request you to kindly take the same on record.

Thanking you,

Yours faithfully,

For Banco Products (India) Limited


CS Pooja Gurnani
Company Secretary



Encl: a/a

GOVERNMENT RECOGNISED EXPORT HOUSE

Regd. Office & Factory : Bil, Near Bhaili Railway Station, Padra Road, Dist. Vadodara - 391 410. Gujarat, India.



J. J. Gandhi & Co.

Practising Company Secretaries

CS J. J. Gandhi - M. Com., LL. B., D. L. P., F. C. S.

F46, India Bulls Mega Mall

Besides Dinesh Mill

Jetalpur, Vadodara - 390 007

Phone (o) 2985022 Cell : 9374620085

Email : jjgandhics@gmail.com

Secretarial Compliance Report of

Banco Products (India) Limited

For the financial year ended 31st March 2022

[Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 as amended]

To

Banco Products (India) Limited

Opp. Bhaili Railway Station,

Bhaili,

Dist. Vadodara

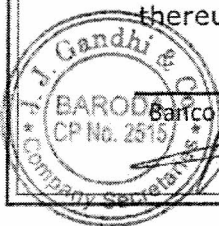
I have examined;

- A. all the documents and records made available to us and explanation provided by **Banco Products (India) Limited** (hereinafter called as '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, 2022** (hereinafter referred to as '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;



Banco Products (India) Ltd. FY 2021-22

Page 1 of 4



J. J. Gandhi & Co.

Practising Company Secretaries

CS J. J. Gandhi - M. Com., LL. B., D. L. P., F. C. S.

F46, India Bulls Mega Mall

Besides Dinesh Mill

Jetalpur, Vadodara - 390 007

Phone (o) 2985022 Cell : 9374620085

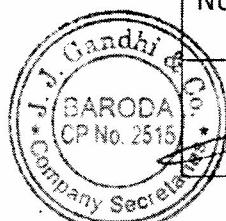
Email : jjgandhics@gmail.com

- 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 during the review 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 during the review period;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - Not Applicable during the review period;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - Not Applicable 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 during the review period;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 - The Company is not registered as Registrar to Issue and Share Transfer Agent.

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;

| Sr. No. | Compliance Requirement (Regulations/ circulars/ guidelines including specific clause) | Deviations | Observations/ remarks of the PCS |
|---------|---|------------|--|
| | Not Applicable | | |





J. J. Gandhi & Co.

Practising Company Secretaries

CS J. J. Gandhi - M. Com., LL. B., D. L. P., F. C. S.

F46, India Bulls Mega Mall

Besides Dinesh Mill

Jetalspur, Vadodara - 390 007

Phone (o) 2985022 Cell : 9374620085

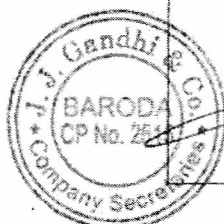
Email : jjgandhics@gmail.com

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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 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 thereunder;

| Sr. No. | Actions taken by | Details of violation | Details of action taken e.g. Fine, warning letter, debarment etc. | Observations/ remarks of the PCS, if any. |
|---------|------------------|----------------------|---|---|
| | Not Applicable | | | |

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports;

| Sr. No. | Observations of the PCS in the previous reports | Observations made in the Secretarial Compliance Report for the year ended 31 st March, 2021 | Actions taken by the Listed entity | Comments of the PCS on the actions taken by the listed entity |
|---------|--|---|--|--|
| 1. | Delayed submission of Business Responsibility Report (BRR) | The Company was under bonafide impression that Business Responsibility Report (BRR) is applicable from the year ending on 31.03.2021 & onwards. The omission was inadvertent and unintentional. | Compliance was made in line with direction given and emailed BRR to all shareholders of the Company. | Company had complied with the direction and no further action is required by the Company |





J. J. Gandhi & Co.

Practising Company Secretaries

CS J. J. Gandhi - M. Com., LL. B., D. L. P., F. C. S.

F46, India Bulls Mega Mall

Besides Dinesh Mill

Jetalpur, Vadodara - 390 007

Phone (o) 2985022 Cell : 9374620085

Email : jjgandhics@gmail.com

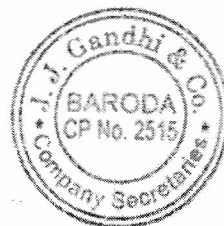
for J. J. Gandhi & Co.

Practising Company Secretaries

(J. J. Gandhi)

Proprietor

FCS No. 3519 and CP No. 2515



Place: Vadodara

Date: 13th May, 2022

UDIN number F003519D000315919