

O/o. CS & CGM (Legal)  
Corporate Office  
Bharat Sanchar Bhawan  
2<sup>nd</sup> Floor, Ph/Fax: 011-2335 3395,  
2335 3389



**भारत संचार निगम लिमिटेड**  
(भारत सरकार का उपक्रम)  
**BHARAT SANCHAR NIGAM LIMITED**  
(A Govt. of India Enterprise)

Dated: 27<sup>th</sup> May, 2022

The Manager,  
Corporate Relationship Department,  
Bombay Stock Exchange Limited,  
Phiroze Jeejeebhoy Towers  
Dalal Street,  
Mumbai-400001

BSE Scrip Code- 960039

Subject: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2022

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report dated 26.05.2022 issued by M/s Kumar Naresh Sinha & Associates, Company Secretaries, for the financial year ended March 31, 2022.

You are requested to kindly take the same on your records.

Thanking you.

Yours faithfully

For BHARAT SANCHAR NIGAM LIMITED

(J.P. Chowdhary)

**Company Secretary & GM (L)**

**Regd. & Corporate Office: Bharat Sanchar Bhawan, H. C. Mathur Lane, Janpath, New  
Delhi-110001**

**Corporate Identity Number (CIN): U74899DL2000GOI107739**

**www.bsnl.co.in**

**Secretarial Compliance Report**  
**of**  
**Bharat Sanchar Nigam Limited (BSNL) for the year ended on**  
**March 31, 2022**

To,

**Bharat Sanchar Nigam Limited**  
**CIN: U74899DL2000GOI107739**  
Bharat Sanchar Bhawan,  
Harish Chandra Mathur Lane,  
Janpath New Delhi 110001

**We have examined:**

- (a) all the documents and records made available to us, and explanation provided by **Bharat Sanchar Nigam 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 March 31, 2022 ("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 there under and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

**The specific Regulations (including amendments, modifications from time to time), 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 [**Not applicable to the company during the Review Period**].
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; [**Not applicable to the company during the Review Period**].
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; [**Not applicable to the company during the Review Period**].
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (**Not applicable to the company during the review period**).

- (f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/guidelines issued there under.

and based on the above examination, we hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, except in respect of matters specified below:

<b>S. No.</b>	<b>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
<b>-NIL-</b>			

- (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 our examination of those records.

- (c) The following are the details of action(s) 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 SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder;

<b>S. No.</b>	<b>Action Taken by</b>	<b>Details of Violation</b>	<b>Details of Action taken e.g., fines, warning letter, debarment, etc.</b>	<b>Observations/remarks of the Practicing Company Secretary, if any.</b>
<b>-NIL-</b>				

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

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended... (The year(s) are to be mentioned)</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
<b>Not Applicable</b>				

**We further report that during the Review Period,**

- i. There was no event of resignation of statutory auditor of the company during the review period and as such, the compliance of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019, issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

**For Kumar Naresh Sinha & Associates**

**Company Secretaries**

**NARESH**

**KUMAR**

**SINHA**

Digitally signed by

NARESH KUMAR

SINHA

Date: 2022.05.26

17:32:50 +05'30'

**CS Naresh Kumar Sinha**

**(Proprietor)**

**FCS: 1807, CP No.: 14984**

**PR: 610/2019**

**UDIN: F001807D000362618**

**Place: Noida**

**Date: 26.05.2022**