

BHARAT EKANSH LIMITED
CIN: L74899DL1985PLC020973

36TH ANNUAL REPORT
FINANCIAL YEAR 2020-2021

Registered Office: PLOT 586, Pocket C, IFC, Ghazipur, New Delhi 110096

Email ID: bharat.ekansh.ltd@gmail.com

Telephone: 9355777335-36

CORPORATE INFORMATION

BOARD OF DIRECTORS

RAHUL KUMAR VERMA	DIRECTOR
JITENDER SINGH RATHI	INDEPENDENT DIRECTOR
SUMIT KHANDELWAL	INDEPENDENT DIRECTOR
VANDANA GUPTA	INDEPENDENT DIRECTOR
VISHAL KUMAR SRIVASTAVA	DIRECTOR

MEMBERS- AUDIT COMMITTEE

SUMIT KHANDELWAL	CHAIRMEN
JITENDER SINGH RATHI	MEMBER
RAHUL KUMAR VERMA	MEMBER
MUKESH KUMAR NAGAR	SECRETARY

MEMBERS- STAKEHOLDERS' RELATIONSHIP COMMITTEE

SUMIT KHANDELWAL	CHAIRMEN
JITENDER SINGH RATHI	MEMBER
VISHAL KUMAR SRIVASTAVA	MEMBER

MEMBERS- NOMINATION & REMUNERATION COMMITTEE

SUMIT KHANDELWAL	CHAIRMEN
RAHUL KUMAR VERMA	MEMBER
VANDANA GUPTA	MEMBER

CHIEF FINANCIAL OFFICER & CHIEF EXECUTIVE OFFICER

VISHAL KUMAR SRIVASTAVA	CHIEF FINANCIAL OFFICER & CHIEF EXECUTIVE OFFICER
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COMPANY SECRETARY

MUKESH KUMAR NAGAR	COMPANY SECRETARY
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AUDITORS

M/S. PLK & ASSOCIATES CHARTERED ACCOUNTANTS	STATUTORY AUDITOR
M/S. SANCHIT MATHUR & CO. COMPANY SECRETARIES	SECRETARIAL AUDITOR

REGISTRAR & TRANSFER AGENT

SKYLINE FINANCIAL SERVICES PRIVATE LIMITED

**D-153A, FIRST FLOOR OKHLA INDUSTRIAL AREA, PHASE-I
NEW DELHI-110020**

WEBSITE:

www.bharatekanshlimited.com

INVESTOR RELATIONS EMAIL ID

bharat.ekansh.ltd@gmail.com

BHARAT EKANSH LIMITED

CORP. OFF. – Chamber no.-2/1, 1st Floor, Tower C, Plot No.1, Sector-90, Expressway, Noida (UP)-201305 **Ph.No.**9355777335-36, **Email:** bharat.ekansh.ltd@gmail.com

NOTICE OF ANNUAL GENERAL MEETING

Notice is hereby given that an Annual General Meeting of the Members of Bharat Ekansh Limited will be held on Thursday, September 30, 2021 at 11.00 A.M. at the Registered office of the Company situated at PLOT 586, Pocket C, IFC, Ghazipur, Delhi 110096, to transact the following business:-

ORDINARY BUSINESS:

ITEM NO 1: Adoption of Audited Standalone Financial Statements for the Financial Year ended on March 31, 2021

To receive, consider and adopt the audited standalone financial statements of the Company for the Financial Year ended March 31, 2021 together with the Reports of the Board of Directors and the Auditors thereon.

ITEM NO. 2: Adoption of Audited Consolidated Financial Statements for the Financial Year ended March on 31, 2021

To receive, consider and adopt the Audited Consolidated Financial Statements of the Company for the Financial Year ended March 31, 2021 together with the Report of the Auditors thereon.

ITEM NO.3: Re-appoint the Directors, liable to retire by rotation:

- a) To appoint a Director in place of Mr. Rahul Kumar (DIN: 08363706), who retires by rotation and being eligible, offers himself for re-appointment.

ITEM NO.4: Re-appoint M/s PLK & Associates, Chartered Accountants (FRN: 024619N), as the statutory Auditor of the Company.

To consider and if thought fit, to pass with or without modification(s), the following Resolution as an Ordinary Resolution:

“RESOLVED THAT pursuant to Section 139 and other applicable provisions, if any, of the Companies Act, 2013 read with the Companies (Audit and Auditors) Rules, 2014 as amended from time to time (“Act”), **M/s PLK & Associates, Chartered Accountants (FRN: 024619N)**, be and are hereby appointed as the statutory auditors of the Company to hold office from the conclusion of this (36th) Annual General Meeting until the conclusion of the 37th Annual General Meeting of the Company.

RESOLVED FURTHER THAT approval be and is hereby accorded for payment of statutory audit fees and other benefits as decided by Board in consultation with **M/s. PLK & Associates, Chartered Accountants (FRN: 024619N)** for the financial year 2021-22 and the Board of Directors of the Company be and are hereby authorised to increase and pay such statutory audit fees as recommended by the Audit Committee and as they may deem fit for the remaining tenure of their appointment.”

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SPECIAL BUSINESS:

ITEM NO.5: Appointment of Mr. Vishal Kumar Srivastava (DIN: 08792936) as Director of the Company

To consider and if thought fit, to pass with or without modification(s), the following Resolution as an Ordinary Resolution:

“RESOLVED THAT pursuant to the provisions of Sections 152, 160, 161 and other applicable provisions of the Companies Act, 2013 read with the rules made thereunder (including any statutory modification(s) or re-enactment thereof for the time being in force), Mr. Vishal Kumar Srivastava (DIN: 08792936), who was appointed as an Additional Director of the Company with effect from 24th September, 2020 and holds office upto the date of this Annual General Meeting, be and is hereby appointed as Director of the Company.”

ITEM NO.6: Appointment of Ms. Vandana Gupta (DIN: 00013488) as Non-Executive Independent Director of the Company

To consider and if thought fit, to pass with or without modification(s), the following Resolution as an Ordinary Resolution:

“RESOLVED THAT pursuant to recommendation of the Nomination and Remuneration Committee and approval of the Board and subject to the provisions of sections 149 and 152 read with schedule IV and other applicable provisions, if any, of the Companies Act, 2013 and Companies (Appointment and Qualifications of Directors) Rules, 2014 and applicable provisions of SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015, (including any statutory modification or re-enactments thereof for the time being in force), Ms. Vandana Gupta (DIN: 00013488), who was appointed as Non- Executive Independent Director (Additional) of the Company wef 14th day of December, 2020, for a period of 5 years be and is hereby appointed as Non- Executive Independent Director of the Company for a period of 5 years.”

ITEM NO.7: Appointment of Mr. Jitender Singh Rathi (DIN: 07562149) as Non-Executive Independent Director of the Company

To consider and if thought fit, to pass with or without modification(s), the following Resolution as an Ordinary Resolution:

“RESOLVED THAT pursuant to recommendation of the Nomination and Remuneration Committee and approval of the Board and subject to the provisions of sections 149 and 152 read with schedule IV and other applicable provisions, if any, of the Companies Act, 2013 and Companies (Appointment and Qualifications of Directors) Rules, 2014 and applicable provisions of SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015, (including any statutory modification or re-enactments thereof for the time being in force), Mr. Jitender Singh Rathi (DIN: 07562149), who was appointed as Non- Executive Independent Director (Additional) of the Company wef 02nd day of September, 2020, for a period of 5 years be and is hereby appointed as Non- Executive Independent Director of the Company for a period of 5 years.”

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For **Bharat Ekansh Limited**

Vishal Kumar Srivastava
Director
DIN: 08792936

Date: 31.08.2021
Place: New Delhi

NOTES:

- A MEMBER ENTITLED TO ATTEND AND VOTE AT THE ANNUAL GENERAL MEETING (“AGM”) IS ENTITLED TO APPOINT A PROXY OR PROXIES TO ATTEND AND ON A POLL TO VOTE ON HIS/HER BEHALF AND A PROXY NEED NOT BE A MEMBER OF THE COMPANY.** A person can act as a proxy on behalf of Members not exceeding 50 and holding in the aggregate, not more than ten percent of the total share capital of the Company, carrying voting rights. Provided that a Member holding more than ten percent of the total share capital of the Company carrying voting rights, may appoint a single person as proxy and such person shall not act as proxy for any other person or shareholder.
- The instrument appointing the Proxy, in order to be effective, must be deposited at the Registered Office of the Company, duly completed and signed, not less than 48 (Forty Eight) hours before the AGM. Proxies submitted on behalf of limited companies, trusts, etc. must be supported by appropriate resolution/authority, as applicable. A Proxy form for the AGM is enclosed along with this notice.
- Members/Proxies should bring the enclosed Attendance Slip, duly filled in, for attending the AGM.
- To support the “Green Initiative”, Members who have not registered their email addresses are requested to register the same with the Company’s Share Registrars and Transfer Agents / their Depository Participants, in respect of shares held in physical / electronic mode, respectively.
- The Notice of the AGM is being sent by electronic mode to all the Members, whose e-mail addresses are registered with the Depositories. For Members who have not registered their e-mail addresses with the Depositories, physical copies are being sent by the permitted modes. The Notice of the AGM is also posted on the website of the Company at <http://www.bharatekanshlimited.com/>.
- All documents referred to in the accompanying Notice and the Explanatory Statement shall be open for inspection at the Corporate Office of the Company during 9.00 a.m. to 1.00 p.m. on all working days (excluding Saturday, Sunday and other Public Holiday) up to the date of the AGM of the Company.
- The route map to the AGM venue is given herein.
- The Register of members and Share Transfer Books of the Company will be closed from 27th September 2021 to 30th September 2021 (both the days inclusive).

REGD. OFF. -Plot No-586, Pocket C, IFC, Ghazipur, Delhi 110096
CIN: L74899DL1985PLC020973, **Website:** www.bharatekanshlimited.com

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I. **INSTRUCTIONS FOR E-VOTING:**

- (i) The voting period begins on Monday, September 27, 2021 (9:00 A.M. IST) and ends on Wednesday, September 29, 2021 (5:00 P.M. IST). During this period shareholders' of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date of Thursday, September 23, 2021 may cast their vote electronically. The e-voting module shall be disabled by CDSL for voting thereafter.
- (ii) Shareholders who have already voted prior to the meeting date would not be entitled to vote at the meeting venue.
- (iii) Pursuant to SEBI Circular No. **SEBI/HO/CFD/CMD/CIR/P/2020/242 dated 09.12.2020**, under Regulation 44 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, listed entities are required to provide remote e-voting facility to its shareholders, in respect of all shareholders' resolutions. However, it has been observed that the participation by the public non-institutional shareholders/retail shareholders is at a negligible level.
- Currently, there are multiple e-voting service providers (ESPs) providing e-voting facility to listed entities in India. This necessitates registration on various ESPs and maintenance of multiple user IDs and passwords by the shareholders.
- In order to increase the efficiency of the voting process, pursuant to a public consultation, it has been decided to enable e-voting to **all the demat account holders, by way of a single login credential, through their demat accounts/ websites of Depositories/ Depository Participants**. Demat account holders would be able to cast their vote without having to register again with the ESPs, thereby, not only facilitating seamless authentication but also enhancing ease and convenience of participating in e-voting process.
- (iv) In terms of SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/242 dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.

Pursuant to abovesaid SEBI Circular, Login method for e-Voting and joining virtual meetings **for Individual shareholders holding securities in Demat mode CDSL/NSDL** is given below:

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Type of shareholders	Login Method
Individual Shareholders holding securities in Demat mode with CDSL	<ol style="list-style-type: none">1) Users who have opted for CDSL Easi / Easiest facility, can login through their existing user id and password. Option will be made available to reach e-Voting page without any further authentication. The URL for users to login to Easi/Easiest are https://web.cdslindia.com/myeasi/home/login or visit www.cdslindia.com and click on Login icon and select New System My easi.2) After successful login the Easi / Easiest user will be able to see the e-Voting option for eligible companies where the e-voting is in progress as per the information provided by company. On clicking the e-voting option, the user will be able to see e-Voting page of the e-Voting service provider for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. Additionally, there is also links provided to access the system of all e-Voting Service Providers i.e. CDSL/NSDL/KARVY/LINKINTIME, so that the user can visit the e-Voting service providers' website directly.3) If the user is not registered for Easi/Easiest, option to register is available at https://web.cdslindia.com/myeasi/Registration/EasiRegistration4) Alternatively, the user can directly access e-Voting page by providing Demat Account Number and PAN No. from e-Voting link available on www.cdslindia.com home page or click on https://evoting.cdslindia.com/Evoting/EvotingLogin The system will authenticate the user by sending OTP on registered Mobile & Email as recorded in the Demat Account. After successful authentication, user will be able to see the e-Voting option where the e-voting is in progress and also able to directly access the system of all e-Voting Service Providers.
Individual Shareholders	<ol style="list-style-type: none">1) If you are already registered for NSDL IDeAS facility, please visit the e-Services website of NSDL. Open web browser by typing the

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<p>holding securities in demat mode with NSDL</p>	<p>following URL: https://eservices.nsd.com either on a Personal Computer or on a mobile. Once the home page of e-Services is launched, click on the “Beneficial Owner” icon under “Login” which is available under ‘IDeAS’ section. A new screen will open. You will have to enter your User ID and Password. After successful authentication, you will be able to see e-Voting services. Click on “Access to e-Voting” under e-Voting services and you will be able to see e-Voting page. Click on company name or e-Voting service provider name and you will be re-directed to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.</p> <p>2) If the user is not registered for IDeAS e-Services, option to register is available at https://eservices.nsd.com. Select “Register Online for IDeAS “Portal or click at https://eservices.nsd.com/SecureWeb/IdeasDirectReg.jsp</p> <p>3) Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsd.com/ either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon “Login” which is available under ‘Shareholder/Member’ section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting</p>
<p>Individual Shareholders (holding securities in demat mode) login through their Depository Participants</p>	<p>You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. After Successful login, you will be able to see e-Voting option. Once you click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.</p>

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Important note: Members who are unable to retrieve User ID/ Password are advised to use Forget User ID and Forget Password option available at above mentioned website.

Helpdesk for Individual Shareholders holding securities in demat mode for any technical issues related to login through Depository i.e. CDSL and NSDL

Login type	Helpdesk details
Individual Shareholders holding securities in Demat mode with CDSL	Members facing any technical issue in login can contact CDSL helpdesk by sending a request at helpdesk.evoting@cdslindia.com or contact at 022- 23058738 and 22-23058542-43.
Individual Shareholders holding securities in Demat mode with NSDL	Members facing any technical issue in login can contact NSDL helpdesk by sending a request at evoting@nsdl.co.in or call at toll free no.: 1800 1020 990 and 1800 22 44 30

(v) Login method for e-Voting and joining virtual meetings for **Physical shareholders and shareholders other than individual holding in Demat form.**

- 1) The shareholders should log on to the e-voting website www.evotingindia.com.
- 2) Click on “Shareholders” module.
- 3) Now enter your User ID
 - a. For CDSL: 16 digits beneficiary ID,
 - b. For NSDL: 8 Character DP ID followed by 8 Digits Client ID,
 - c. Shareholders holding shares in Physical Form should enter Folio Number registered with the Company.
- 4) Next enter the Image Verification as displayed and Click on Login.
- 5) If you are holding shares in demat form and had logged on to www.evotingindia.com and voted on an earlier e-voting of any company, then your existing password is to be used.
- 6) If you are a first-time user follow the steps given below:

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	For Physical shareholders and other than individual shareholders holding shares in Demat.
PAN	Enter your 10 digit alpha-numeric *PAN issued by Income Tax Department (Applicable for both demat shareholders as well as physical shareholders) <ul style="list-style-type: none">• Shareholders who have not updated their PAN with the Company/Depository Participant are requested to use the sequence number sent by Company/RTA or contact Company/RTA.
Dividend Bank Details OR Date of Birth (DOB)	Enter the Dividend Bank Details or Date of Birth (in dd/mm/yyyy format) as recorded in your demat account or in the company records in order to login. <ul style="list-style-type: none">• If both the details are not recorded with the depository or company, please enter the member id / folio number in the Dividend Bank details field.

(vi) After entering these details appropriately, click on “SUBMIT” tab.

(vii) Shareholders holding shares in physical form will then directly reach the Company selection screen. However, shareholders holding shares in demat form will now reach ‘Password Creation’ menu wherein they are required to mandatorily enter their login password in the new password field. Kindly note that this password is to be also used by the demat holders for voting for resolutions of any other company on which they are eligible to vote, provided that company opts for e-voting through CDSL platform. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.

(viii) For shareholders holding shares in physical form, the details can be used only for e-voting on the resolutions contained in this Notice.

(ix) Click on the EVSN for “Bharat Ekansh Limited”.

(x) On the voting page, you will see “RESOLUTION DESCRIPTION” and against the same the option “YES/NO” for voting. Select the option YES or NO as desired. The option YES implies that you assent to the Resolution and option NO implies that you dissent to the Resolution.

(xi) Click on the “RESOLUTIONS FILE LINK” if you wish to view the entire Resolution details.

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- (xii) After selecting the resolution, you have decided to vote on, click on “SUBMIT”. A confirmation box will be displayed. If you wish to confirm your vote, click on “OK”, else to change your vote, click on “CANCEL” and accordingly modify your vote.
- (xiii) Once you “CONFIRM” your vote on the resolution, you will not be allowed to modify your vote.
- (xiv) You can also take a print of the votes cast by clicking on “Click here to print” option on the Voting page.
- (xv) If a demat account holder has forgotten the login password then Enter the User ID and the image verification code and click on Forgot Password & enter the details as prompted by the system.
- (xvi) **Additional Facility for Non – Individual Shareholders and Custodians –For Remote Voting only.**
- Non-Individual shareholders (i.e. other than Individuals, HUF, NRI etc.) and Custodians are required to log on to www.evotingindia.com and register themselves in the “Corporates” module.
 - A scanned copy of the Registration Form bearing the stamp and sign of the entity should be emailed to helpdesk.evoting@cdslindia.com.
 - After receiving the login details a Compliance User should be created using the admin login and password. The Compliance User would be able to link the account(s) for which they wish to vote on.
 - The list of accounts linked in the login should be mailed to helpdesk.evoting@cdslindia.com and on approval of the accounts they would be able to cast their vote.
 - A scanned copy of the Board Resolution and Power of Attorney (POA) which they have issued in favour of the Custodian, if any, should be uploaded in PDF format in the system for the scrutinizer to verify the same.
 - Alternatively Non Individual shareholders are required to send the relevant Board Resolution/ Authority letter etc. together with attested specimen signature of the duly authorized signatory who are authorized to vote, to the Scrutinizer and to the Company at the email address viz; bharat.ekansh.limited@gmail.com , if they have voted from individual tab & not uploaded same in the CDSL e-voting system for the scrutinizer to verify the same.

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PROCESS FOR THOSE SHAREHOLDERS WHOSE EMAIL/MOBILE NO. ARE NOT REGISTERED WITH THE COMPANY/DEPOSITORIES

1. For Physical shareholders- please provide necessary details like Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) by email to **Company/RTA email id**.
2. For Demat shareholders -Please update your email id & Mobile No. with your respective Depository Participant (DP)
3. For Individual Demat shareholders – Please update your email id & mobile no. with your respective Depository Participant (DP) which is mandatory while e-Voting & joining virtual meetings through Depository.

If you have any queries or issues regarding attending AGM & e-Voting from the CDSL e-Voting System, you can write an email to helpdesk.evoting@cdslindia.com or contact at 022-23058738 and 022-23058542/43.

All grievances connected with the facility for voting by electronic means may be addressed to Mr. Rakesh Dalvi, Sr. Manager, (CDSL,) Central Depository Services (India) Limited, A Wing, 25th Floor, Marathon Futurex, Mafatlal Mill Compounds, N M Joshi Marg, Lower Parel (East), Mumbai - 400013 or send an email to helpdesk.evoting@cdslindia.com or call on 022-23058542/43.

For **Bharat Ekansh Limited**

Sd/
Vishal Kumar Srivastava
Director
DIN: 08792936

Date: 31.08.2021
Place: New Delhi

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EXPLANATORY STATEMENT

(Pursuant to Section 102 of the Companies Act, 2013)

ITEM NO.5: Appointment of Mr. Vishal Kumar Srivastava (DIN: 08792936) as Director of the Company

Mr. Vishal Kumar Srivastava (DIN: 08792936) was appointed as an Additional Director of the Company w. e. f. 24th September, 2020 in terms of Section 161 of the Companies Act, 2013 (“Act”) subject to the Articles of the Association of the Company and holds such office upto the date of this Annual General Meeting.

The Company has received notice in writing from the Member under Section 160 of the Act, proposing his candidature for the office of the Director of the Company.

Mr. Vishal Kumar Srivastava has given his consent and declaration of non-disqualification to act as Director of the Company.

None of the other Directors, Key Managerial Personal(s) and their relatives are in any way, concerned or interested, whether financially or otherwise in this resolution.

This statement may also be regarded as an appropriate disclosure to take decision thereon. The Board recommends the above Ordinary Resolution set forth in item no.4 for the approval of the members of the Company.

ITEM NO.6: Appointment of Ms. Vandana Gupta (DIN: 00013488) as Non-Executive Independent Director of the Company

Ms. Vandana Gupta (DIN: 00013488), was appointed as Non- Executive Independent Director (Additional) of the Company in terms of Section 149, 161 of the Companies Act, 2013 and applicable provisions of SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015 wef 14th day of December, 2020, for a period of 5 years.

The Nomination & Remuneration Committee of the Board of Directors, on the basis of the report of performance evaluation of Independent Director, have recommended regularization of appointment of Ms. Vandana Gupta as Non-Executive Independent Director of the Company for the period of 5 Years wef 14th December, 2020 to 13th December, 2025.

ITEM NO.7: Appointment of Mr. Jitender Singh Rathi (DIN: 07562149) as Non-Executive Independent Director of the Company

Mr. Jitender Singh Rathi (DIN: 07562149), was appointed as Non- Executive Independent Director (Additional) of the Company in terms of Section 161 of the Companies Act, 2013 and applicable provisions of SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015 wef 02nd day of September, 2020, for a period of 5 years.

The Nomination & Remuneration Committee of the Board of Directors, on the basis of the report of performance evaluation of Independent Director, have recommended regularization of appointment of Mr. Jitender Singh Rathi as Non-Executive Independent Director of the Company for the period of 5 Years wef 02nd day of September, 2020 to 01st day of September, 2025.

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ATTENDANCE SLIP

PLEASE FILL ATTENDANCE SLIP AND HAND IT OVER AT THE ENTRANCE OF THE MEETING VENUE

Name	
Address	
DP-ID/CLIENT-ID*	
Regd. Folio No.#	
No. of shares held	
Whether the member is attending the meeting in person or by proxy or by authorized representative.	
Name of the proxy (to be filed in if proxy attends instead of the member).	

**Applicable for investors holding shares in Electronic form.*

Applicable for investors holding shares in Electronic form.

I certify that I am a registered Shareholders/Proxy for the registered Shareholder of the Company. I/we hereby record my/our presence at the Annual General Meeting of the Company held on Thursday, September 30, 2021 at 11.00 A.M, at the Registered Office of the Company situated at PLOT 586, Pocket C, IFC, Ghazipur, Delhi 110096.

Signature of the Member/Proxy
(To be signed at the time of handing over the slip)

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Form No. MGT-11

Proxy Form

(Pursuant to Section 105(6) of the Companies Act, 2013 and Rule 19(3) of the Companies (Management and Administration) Rules, 2014)

CIN: L74899DL1985PLC020973

Name of the Company: BHARAT EKANSH LIMITED

Registered Office: PLOT 586, Pocket C, IFC, Ghazipur, Delhi 110096

Name of the Member(s)		
Registered Address:		
E-mail Id:		
*DP Id. / Client Id.		Regd. Folio No.

(* Applicable for members holding share(s) in electronic form)

I / We, being the member(s) of shares of the above named company, hereby appoint:

1. Name : _____
Address : _____
E-mail ID : _____
Signature : _____, or failing him _____

2. Name : _____
Address : _____
E-mail ID : _____
Signature : _____

as my/our proxy to attend and vote (on a poll) for me/us and on my/our behalf at the Annual General Meeting of the Company, to be held on Thursday, September 30, 2021 at 11.00 A.M, at the Registered Office of the Company situated at PLOT 586, Pocket C, IFC, Ghazipur, Delhi 110096 and at any adjournment thereof in respect of such resolutions as are indicated below:

Resolution No.	Resolutions	Optional	
		For	Against
1	Adoption of Audited Standalone Financial Statements for the Financial Year ended on March 31, 2021		
2	Adoption of Audited Consolidated Financial Statements for the Financial Year ended March 31, 2021		
3	Re-appoint the Directors, liable to retire by rotation: a) To appoint Director in place of Mr. Rahul Kumar (DIN: 08363706), who retires by rotation and being eligible, offers himself for re-appointment.		
4	Re-appoint M/s PLK & Associates, Chartered Accountants (FRN: 024619N), as the statutory Auditor of the Company		

BHARAT EKANSH LIMITED

CORP. OFF. – Chamber no.-2/1, 1st Floor, Tower C, Plot No.1, Sector-90, Expressway, Noida (UP)-201305 **Ph.No.**9355777335-36, **Email:** bharat.ekansh.ltd@gmail.com

5	Appointment of Mr. Vishal Kumar Srivastava (DIN: 08792936) as Director of the Company		
6	Appointment of Ms. Vandana Gupta (DIN: 00013488) as Non-Executive Independent Director of the Company		
7	Appointment of Mr. Jitender Singh Rathi (DIN: 07562149) as Non-Executive Independent Director of the Company		

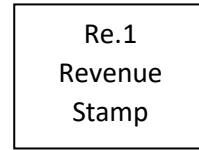
Signed this _____ day of _____ 2021.

Signature of Shareholders(s)

Signature of Proxy holders(s)

Note:

Affix Revenue Stamp

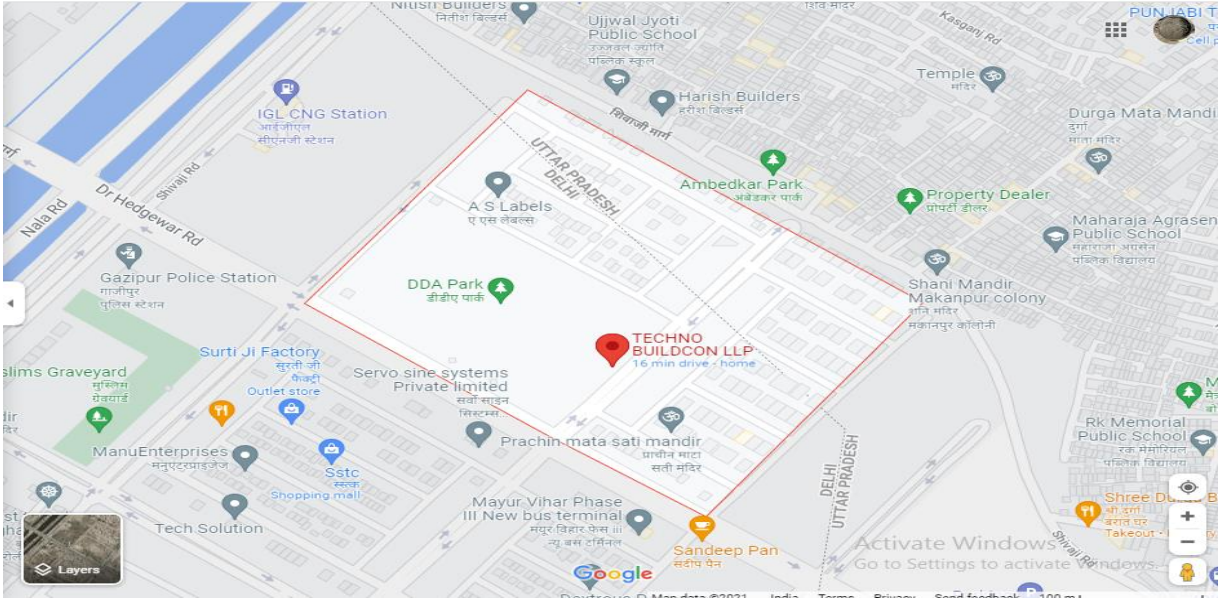


1. This form of proxy in order to be effective should be duly completed and deposited at the Registered Office of the Company, not less than 48 hours before the commencement of the Meeting.
2. For the resolution and Notes, please refer to the Notice of the Annual General Meeting.
3. It is optional to put a(√) in the appropriate column against the Resolution indicated in the Box. If, you leave the ' For' and 'against' column blank against any or all Resolutions, your Proxy will be entitled to vote in the manner as he/she think appropriate.

BHARAT EKANSH LIMITED

CORP. OFF. – Chamber no.-2/1, 1st Floor, Tower C, Plot No.1, Sector-90, Expressway, Noida (UP)-
201305 **Ph.No.**9355777335-36, **Email:** bharat.ekansh.ltd@gmail.com

MAP FOR AGM VENUE



BOARDS' REPORT

Dear Members,

Your directors have pleasure in presenting the 36th Annual Report and the Audited Statements for the Financial Year ended March 31, 2021.

BACKGROUND

The company was incorporated under Companies Act, 1956 on 18th May, 1985. The company got its registration as NBFC from Reserve Bank of India on 22.09.1998 vide Registration No. B-14.01249. The Company was a Category B-Non-Banking Financial Company engaged in the business of providing loans and Finance to firms, bodies corporate and financial leasing and hiring, financial and investment consultancy etc. The CoR (Certificate of Registration) of the Company has been cancelled by the Reserve Bank of India (RBI) by reason of non-maintenance of minimum Net Owned Fund (NOF) as prescribed by the RBI, The Company had appealed against the order of cancellation of CoR of the Company to the Appellate Authority. The Appellate Authority vide its order has dismissed the appeal. Company is now focusing on its main operational activities i.e. Real Estate & Consultancy services.

FINANCIAL RESULTS

The financial performance of the Company during for the Financial Year ended March 31, 2021 is as under:

Particulars	(in RS.)	
	F.Y. 2020-21	F.Y. 2019-2020
Income	25,97,650.00	23,57,400.00
Expenditure	21,53,650.00	20,33,610.00
Profit Before Tax	4,44,000.00	3,23,794.00
Net Profit/loss After Taxation	328140	1,78,490.00
Basic Earnings per Share	0.10	0.22

STATE OF COMPANY'S AFFAIRS AND FUTURE OUTLOOK

During the year under review, the Company has gained Profit before tax of Rs. 4,44,000. The company expects good business and returns in future. The performance of the company during the period under review has been satisfactory.

CHANGE IN NATURE OF BUSINESS

The company was a Non-Banking Financial Company registered with the Reserve Bank of India. The CoR of the Company has been cancelled by the Reserve Bank of India (RBI) by reason of non-maintenance of minimum Net Owned Fund (NOF) as prescribed by the RBI, The Company had appealed against the order of cancellation of CoR of the Company to the Appellate Authority. The Appellate Authority vide its order has dismissed the appeal. Company is now focusing on its main operational activities i.e. Real Estate & Consultancy services.

DIVIDEND

In order to conserve the resources of the Company for the good future prospects and growth and as the Company has gained small amount of Profit in the said reporting period, the Board of Directors taking this view and have decided not to distribute any dividend out of the reserve of the Company and therefore the Board of Directors of the company has not recommended any dividend to the shareholders.

TRANSFER TO RESERVES

Net Profit for the period amounting to Rs 3.28 lakhs has been transferred to the Reserves.

DEPOSITS

The Company has not invited/ accepted any deposits from the public during the year ended March 31, 2021. There were no unclaimed or unpaid deposits as on March 31, 2021.

CHANGES IN SHARE CAPITAL

a. Disclosure regarding issue of equity shares:

The Company has made a preferential allotment of 4173100 number of equity shares @ 13.30 per share dated 30th day of July 2020.

b. Disclosure regarding issues of equity shares with differential rights:

The Company has not issued any equity shares with differential rights during the year under review.

c. Disclosure regarding issues of employee stock options:

The Company has not provided any Stock Option Scheme to the employees during the year under review.

d. Disclosure regarding the issues of sweat equity shares:

The Company has not issued any Sweat Equity Shares during the year under review.

Significant and material orders passed by the regulators or courts or tribunals impacting the going concern status or company operations in future.

No such order has been passed by the regulator, court or tribunal that may impact the company's operations in future or may affect its going concern status.

Material Changes between the date of the Board Report & End of the Financial Year.

There are no such material changes between the date of the Board Report & End of the Financial Year.

EXTRACT OF ANNUAL RETURN

The Extract of Annual Return in **Form MGT-9** pursuant to Section 92(3) of the Companies Act, 2013 and Rule 12 of the Companies (Management and Administration) Rules, 2014 for the financial year 2020-21 has been enclosed with this report in **ANNEXURE- I**.

CORPORATE GOVERNANCE

Since, the paid-up share capital of the company is less than Rs. 10 Crores and Net worth is less than Rs. 25 Crores, the provisions of the Corporate Governance as stipulated under Regulation 15(2) of SEBI (LODR) Regulations, 2015 are not applicable to the company. However, your company has made every effort to comply with the provisions of the Corporate Governance and to see that the interest of the shareholders and the company are properly served. It has always been the company endeavors to excel through better corporate governance and fair and transparent practices and many of which has always been in place even before they were mandated by the law of land.

The management of the company believes that it will further enhance the level of corporate governance in the company.

NUMBER OF MEETING OF THE BOARD OF DIRECTORS

During the financial year **2020-21**

9 (Nine) Meetings of Board of Directors of the Company were held and the intervening gap between the Meetings was within the period prescribed under the Companies Act, 2013 (i.e., the maximum interval between any two board meeting did not exceed 120 Days)

S.NO.	Date
1	30/06/2020
2	02/09/2020
3	14/09/2020
4	24/09/2020
5	29/09/2020
6	13/11/2020
7	14/12/2020
8	01/01/2021
9	21/01/2021

***30/06/2020- Meeting of Independent Directors**

NUMBER OF MEETINGS OF COMMITTEE

During the Financial year 2020-21, following meetings were held:-

4 (Four) Audit Committee Meetings (AC)

S.NO	Date
1.	30/06/2020
2.	14/09/2020
3.	13/11/2020
4.	03/03/2020

5 (Five) Nomination and Remuneration Committee Meeting (NRC)

S.NO.	Date
1.	30/06/2020
2.	02/09/2020
3.	24/09/2020
4.	14/12/2020
5.	01/01/2021

4 (Four) Stakeholder Relationship Committee Meeting (SRC)

S.NO.	Date
1.	30/06/2020
2.	24/09/2020
3.	14/12/2020
4.	03/03/2021

BOARD EVALUTION

SEBI (LODR) Regulations 2015 Mandate that board shall monitor and Review the Board Evaluation Framework. The Framework includes the evaluation of Directors on Various parameters such as:

- ✓ Board Dynamics and relationship
- ✓ Information's inflows
- ✓ Decision making
- ✓ Relationship with stakeholders
- ✓ Company Performance and Strategy
- ✓ Tracking Board and committee effectiveness
- ✓ Peer evaluation

The Companies Act, 2013 states that formal annual evaluation needs to be made by the board of its own performance and the manner in which such performance evaluation was carried out is as under:

The Performance evaluation framework is in place and has been circulated to all the directors to seek their response on the evaluation of the entire board and independent directors. The Nomination and Remuneration & Compensation Committee has carried out evaluation of director's performance.

The criteria of evaluation is exercise of responsibilities in a bonafide manner in the interest of the Company, striving to attend meetings of the Board of Directors/Committees of which he/she is a member/general meetings, participating constructively and actively in the meetings of the Board/Committee of the Board etc.

FAMILIARIZATION PROGRAM FOR INDEPENDENT DIRECTORS

All new independent directors inducted into the Board attend an orientation program. The details of training and familiarization program are provided at the time of the appointment of an independent director, the Company issues a formal letter of appointment outlining his / her role, function, duties and responsibilities.

BHARAT EKANSH LIMITED CODE OF CONDUCT FOR THE PREVENTION OF INSIDER TRADING

The Board of Directors has adopted the Insider Trading Policy in accordance with the requirements of the SEBI (Prohibition of Insider Trading) Regulation, 2015 and the applicable Securities laws. The Insider Trading Policy of the Company lays down guidelines and procedures to be followed, and disclosures to be made while dealing with shares of the Company, as well as the consequences of violation. The policy has been formulated to regulate, monitor and ensure reporting of deals by employees and to maintain the highest ethical standards of dealing in Company securities.

The Insider Trading Policy of the Company covering code of practices and procedures for fair disclosure of unpublished price sensitive information and code of conduct for the prevention of insider trading.

POLICIES

We seek to promote and follow the highest level of ethical standards in all our business transactions guided by our value system. The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandated the formulation of certain policies for all listed companies.

The policies are reviewed periodically by the Board and updated based on need and new compliance requirement.

- ✓ Annual Evaluation Policy
- ✓ Archive Policy
- ✓ Board Diversity Policy
- ✓ Policy On Determination Of Materiality Of Events
- ✓ Policy On Material Subsidiaries
- ✓ Preservation Of Records
- ✓ Related Party Transaction Policy
- ✓ Vigil Mechanism Policy

BOARD INDEPENDENCE

Definition of 'Independence' of Directors is derived from Regulation 25 of SEBI (LODR) Regulations 2015 and Section 149(6) of the Companies Act, 2013. Based on the confirmation /disclosures received from the Directors under section 149(7) of the Companies Act 2013 and on evaluation of the relationships disclosed, the following Non-Executive Directors are considered as Independent Directors as on 31st March, 2021.

- a) Mr. Sumit Khandelwal
- b) Ms. Vandana Gupta
- c) Mr. Jitender Singh Rathi

PARTICULARS OF LOANS, GUARANTEES AND INVESTMENTS UNDER SECTION 186 OF THE COMPANIES ACT, 2013

The Company during the year has not given any loans or provided any security and has not made any investment. Therefore the clause is not applicable.

PARTICULARS OF CONTRACTS OR ARRANGEMENTS WITH RELATED PARTIES

Pursuant to the provisions of Section 188 of the Companies Act, 2013 read with the rules made there under and SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015, the Company had not entered into any contract/arrangement/transaction with related parties which could be considered material. There are no materially significant related party transactions made by the Company with Promoters, Directors, Key Managerial Personnel or other designated persons which may have a potential conflict with the interest of the Company at large. Accordingly, particulars of contracts or arrangements with related parties referred to in Section 188(1) of the Companies Act, 2013 along with the justification for entering into such contract or arrangement in Form AOC-2 does not form part of the report. **(ANNEXTURE V)**

INTERNAL FINANCIAL CONTROL SYSTEM

The Company has in place adequate internal financial controls across the organization. The same is subject to review periodically by the internal audit cell for its effectiveness. During the year, such controls were tested and no reportable material weakness in the design or operation was observed.

AUDITORS AND AUDITORS' REPORT

STATUTORY AUDITORS:

M/s. PLK & Associates, Chartered Accountants (Firm Registration No. 024619N) were appointed as Statutory Auditors for a period of 5 years in Annual General Meeting held on 30th September, 2017 till the financial year 2021. Their re-appointment has been considered and approved by the Board in the Board Meeting held on 31.08.2021 for the financial year 2021-22. Their continuance of appointment and payment of remuneration are to be confirmed and approved in the ensuing Annual General Meeting. The Company has received a certificate from the above Auditors to the effect that if their appointment is ratified, it would be in accordance with the provisions of Section 141 of the Companies Act, 2013. The Notes on financial statement referred to in the Auditors' Report are self-

explanatory and do not call for any further comments.

SECRETARIAL AUDIT REPORT

Pursuant to the provisions of Section 204 of the Companies Act, 2013 and The Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, the Company has appointed M/s. Sanchit Mathur & Co., Company Secretaries, a firm of Company Secretaries in Practice to undertake the Secretarial Audit of the Company. The Report of the Secretarial Audit in Form MR-3 for the Financial Year ended March 31, 2021 is annexed as **Annexure-II** to the Report.

COST AUDITOR

As per the Cost Audit Orders, Cost Audit is not applicable to the Company's in respect of its product/services.

MATERIAL CHANGES AFFECTING THE FINANCIAL POSITION OF THE COMPANY:

No Material Changes affecting the Financial Position of Company took place during the financial year under review.

VIGIL MECHANISM

The Company believes in the conduct of its affairs in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior. The Company is committed to develop a culture in which every employee feels free to raise concerns about any poor or unacceptable practice and misconduct. In order to maintain the standards has adopted lays down this Whistle Blower Policy to provide a framework to promote responsible and secure whistle blowing. The Board of Directors of your company has adopted the Vigil Mechanism and Whistle Blower Policy in Compliance of the Companies Act, 2013.

DETAILS OF SUBSIDIARY, JOINT VENTURE OR ASSOCIATES:

1. Nirvaza Enterprises Private Limited (Subsidiary Company)

HUMAN RESOURCE DEVELOPMENT

The Company seeks to nurture a mutually beneficial relationship with its employees. This relationship is characterized by the Investment which the company makes in its employees by providing challenging roles and assignment opportunities for personal growth, relevant and timely performance support, training and an enabling environment. The company seeks to create a workplace which combines achievement orientation with care for employees. The Company lists "people" as one of its stated core values.

Your Company takes the pride in the Commitment, Competence and dedication shown by its employees in all areas of business. Various HR initiatives are taken to align the HR Policies to the growing requirements of the business.

CONSERVATION OF ENERGY, TECHNOLOGY, ABSORPTION, FOREIGN EXCHANGE EARNINGS AND OUTGO

The details of Energy, Technology, Absorption, Foreign Exchange Earnings and Outgo are as under:

a) Conservation of Energy:

Steps taken for conservation	NA
Steps taken for utilizing alternate sources of energy	NA
Capital investment on energy conservation equipment's	NA

b) Technology Absorption:

Efforts made for technology absorption	NA
Benefits derived	NA
Expenditure on Research & Development, if any	NA
Details of technology imported, if any	NA
Year of import	NA
Whether imported technology fully absorbed	NA
Areas where absorption of imported technology has not taken place, if any	NA

c) Foreign Exchange Earnings/ Outgo: (in Indian Rs.)

Earnings	No
Outgo	No

COMPLIANCE

The Company has complied and continues to comply with the applicable regulations, circulars and guidelines issued by the Ministry of Corporate Affairs (MCA), Stock Exchange(s), Reserve Bank of India (RBI), Securities and Exchange Board of India (SEBI) etc.

The Company has complied with all the applicable provisions of the Companies Act, 1956 and the Companies Act, 2013, Listing Agreement executed with the Stock Exchange, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and other applicable rules/regulations/guidelines issued from time to time.

RISK MANAGEMENT POLICY

The management has taken all necessary steps to identify the elements of risks, if any. The management has implemented an effective and meaningful system to safeguard the assets of the company.

The Board has to review the business plan at regular intervals and develop the Risk Management Strategy which shall encompass laying down guiding principles on proactive planning for identifying, analyzing and mitigating all the material risks, both external and internal viz. Environmental, Business, Operational, Financial and others. Communication of Risk Management Strategy to various levels of management for effective implementation is essential for achieving the goals of the organization.

PARTICULARS OF EMPLOYEES

In terms of the provisions of Section 197 of the Companies Act, 2013 read with Rule, 5 of The Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, none of the Company's Employees who were in receipt of a remuneration not less than Rs. 60 Lacs during the financial year; or the employee receipt of the remuneration for any part of that year, at a rate which, in aggregate, was not less than Rs. 5 lacs per month and hence no particulars are required to be disclosed in this report.

DIRECTORS AND KEY MANAGERIAL PERSONNEL

✓ **Chairman of the Board**

Mr. Vishal Kumar Srivastava, Director is Chairman of the Board.

✓ In terms of section 149 of the companies Act 2013, Company has appointed following as Independent Directors:

- Ms. Vandana Gupta (Appointed w. e. f 14.12.2020)
- Mr. Jitender Singh Rathi (Appointed w. e. f 02.09.2020)
- Ms. Nitika Dadeech (*Resigned w. e. f 14.12.2020*)
- Mr. Shah Nawaz Hussain (Resigned w. e. f 01.07.2020)

✓ In terms of Section 203 of the Act, following are appointed/designated as Key Managerial Personnel of your Company by the Board:

- Mr. Vishal Kumar Srivastava (Appointed w. e. f 24.09.2020)
- Ms. Tanya Thakur (Resigned w.e.f 31.12.2020)
- Mr. Niraj Kumar (Resigned w. e. f 13.12.2020)

DECLARATION BY INDEPENDENT DIRECTORS U/S 149(6)

All independent directors have given the Declaration that they meet the criteria of independence as laid down under the Companies Act, 2013 and SEBI (LODR) Regulations, 2015. **(ANNEXTURE VI)**

COMMITTEES OF THE BOARD

Currently, the Board Has 3 Committees: The Audit Committee, The Nomination and Remuneration Committee, The Stakeholders Relationship Committee, has Proper composition of Independent Directors and Executive Director. **(ANNEXTURE IV)**

INTERNAL FINANCIAL CONTROL AND ITS ADEQUACY

The board has adopted policies and procedures for ensuring the orderly and efficient conduct of its business, including adherence to the company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial disclosures.

SIGNIFICANT AND MATERIAL ORDERS

There are no significant and material orders passed by the regulators or courts or tribunals impacting the going concern status and Company's operations in future.

MANAGEMENT DISCUSSION AND ANALYSIS REPORT

Pursuant to Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, a detailed management discussion and analysis report has been appended separately as **(ANNEXTURE-III)**

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

As per the Companies Act, 2013, Companies having net worth of Rs. 500 Crore or more, or turnover of Rs. 1000 Crore or more or net profit of Rs. 5 Crore or more during any financial year are required to constitute a Corporate Social Responsibility Committee (CSR) of the Board of Directors comprising three or more directors, at least one of whom should be an independent director and such company shall spend at least 2% of the average net profit of the company's three immediately preceding financial years.

During the financial year 2020-21 the Company has not crossed the threshold limit for the Corporate Social Responsibility Committee as required under the Section 135 of the Companies Act, 2013 (as defined above). So the company has not constituted the CSR committee and not done any activities defined under Schedule VII of the Companies Act, 2013.

DISCLOSURES UNDER SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION & REDRESSAL) ACT, 2013

The Company has adequate system for prevention of Sexual Harassment of Women at workplace and has set up cell for the same. Pursuant to the requirements of Section 22 of Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act 2013 read with rules thereunder, the Company has not received any complaint of sexual harassment during the reporting period.

DIRECTORS' RESPONSIBILITY STATEMENT AS REQUIRED UNDER SECTION 134(5) OF THE COMPANIES ACT, 2013

Pursuant to the provisions of Section 134(3) (c) read with Section 134(5) of the Companies Act, 2013, the Directors of your company confirm that:

- a) In the preparation of the annual accounts for the financial year ended 31st March, 2021, the applicable accounting standards had been followed along with proper explanation relating to material departures;
- b) the directors had selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company as at 31st March, 2021 and of the profit /loss of the Company for that period;

- c) The directors had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act 2013 for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities;
- d) The directors had prepared the annual accounts on a going concern basis;
- e) The Board of Directors have laid down internal financial controls to be followed by the Company and that such internal financial controls are adequate and were operating effectively;
- f) The directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively;
- g) The Board of Directors have adopted policies and procedures for ensuring the orderly and efficient conduct of its business, including adherence to the company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and timely preparation of reliable financial disclosures.

ACKNOWLEDGEMENT:

Your Directors take this opportunity to express the gratitude to all investors, clients, vendors, bankers, Regulatory and Government Authorities, Stock Exchanges and Business Associates for their cooperation, encouragement and continued support extended to the Company. Your Directors also wish to place on record their appreciation to the Associates for their continuing support and unstinting efforts in ensuring an excellent all round operational performance at all levels.

For and on Behalf of Board of
Bharat Ekansh Limited

SD/-
Vishal Kumar Srivastava
Director
DIN: 08792936

SD/-
Rahul Kumar Verma
Director
DIN: 08363706

Date: 31.08.2021
Place: New Delhi

ANNEXTURE I

**Form No. MGT-9
EXTRACT OF ANNUAL RETURN
As on the financial year ended on March 31, 2021**

[Pursuant to section 92(3) of the Companies Act, 2013 and rule 12(1) of the Companies (Management and Administration) Rules, 2014]

I. REGISTRATION AND OTHER DETAILS:

I	CIN	L74899DL1985PLC020973
ii	Registration Date	18/05/1985
iii	Name of the Company	Bharat Ekansh Limited
Iv	Category / Sub-Category of the Company	COMPANY LIMITEDBY SHARES- INDIAN NON- GOVERNMENT COMPANY
V	Address of the Registered office and contact details	PLOT 586, Pocket C, IFC, Ghazipur, Delhi NEW DELHI East Delhi DL 110096
Vi	Whether listed company	Listed at Calcutta Stock Exchange Limited(Now on Dissemination Board)
Vii	Name, Address and Contact details of Registrar and Transfer Agent, if any	Skyline Financial Services Private Limited D-153A, First Floor Okhla Industrial Area, Phase-I New Delhi-110020

II PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

All the business activities contributing 10 % or more of the total turnover of the company shall be stated:-

Sl. No.	Name and Description of main products / services	NIC Code of the Product/ service	% total turnover of the company
1	Financial Services other than Insurance and Pension Funding activities	649	100%

1	Institutions													
a)	Mutual Funds	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
b)	Banks/FI	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
c)	Central Government	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
d)	State Government	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
e)	Venture Capital Fund	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
f)	Insurance Companies	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
g)	FII's	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
h)	Foreign Venture Capital Fund	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
i)	Foreign Portfolio Investor	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
j)	Alternate Investment Fund(s)	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
k)	Any Other	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
	Sub-Total (B)(1)	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
2	Non-Institutions													
a)	Bodies Corporate													
1)	Indian	0	0	405731	0	405731	8.11	21500	0	384231	0	405731	8.11	0.00
2)	Overseas	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
b)	Individuals													
1)	Individual shares holders having nominal share capital upto Rs. 1,00,000	0	0	1690	0	1690	0.03	0	0	1690	0	1690	0.03	0.00
2)	Individual shares holders having nominal	0	0	4550800	0	4550800	91.02	0	0	4530800	0	4530800	90.62	-0.40

	share capital Excess of Rs. 1,00,000													
c)	HUF	0	0	21800	0	21800	0.44	21700	0	100	0	21800	0.44	0.00
d)	Non Resident Indian	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
e)	NBFC Registered with RBI	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
f)	Foeign National	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
g)	Clearing Members	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
h)	Trust	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
l)	Foreign Corporate Bodies	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
j)	Investor Education and Protection Fund	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
k)	Others	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
	Sub-Total (B)(2)	0	0	4980021	0	4980021	99.6 0	43200	0	4916821	0	4960021	99.2 0	-0.40
	Total Public Shareholding (B)	0	0	4980021	0	4980021	99.6 0	43200	0	4916821	0	4960021	99.2 0	-0.40
C	Non- Promoter Non-Public Shareholding													
1)	Shares Held By Custodian for GDRs & ADRs	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
2)	Employee Benefit Trust (under SEBI(Share based Employee Benefit) Regulations	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00

	2014)													
	Total Non-Promoter Non-Public Shareholding (C)	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0.00
	Grand Total	0	0	5000021	0	5000021	100.00	43200	0	4956821	0	5000021	100.00	0.00

(ii) Shareholding of Promoters

Sr.No	Name of Shareholder	Shareholding As on 31/03/2020		Transaction Date	Increase /Decrease	Reason	Cummulative Shareholding as on 31/03/2021	% of Total Shares of the Company	Pan of Shareholder	Folio No.
		No of Shares Held	% To the Total Shares							
Promoters and Promoter Group										
1	MOHIT JAIN	20000	0.40						AFLPJ5292B	763
				12-Mar-2021	20000	Purchase	40000	0.80		
				19-Mar-2021	-20000	Sale	20000	0.40		
				31-Mar-2021	20000	Purchase	40000	0.80		
						Balance	40000	0.80		

Public Shareholding (shareholding pattern of top 10 shareholders other than director, promoters and holders of ADRs and GDRs)										
1	SANJAY RASTOGI	1296269	25.9 3						AAKPR5244 F	859
						Balance	1296269	25.93		
2	MEENU RASTOGI	1296269	25.9 3						AAKPR5237J	860
						Balance	1296269	25.93		
3	VASU RASTOGI	555544	11.1 1						BQHPR2845 G	862
						Balance	555544	11.11		
4	ISHAN RASTOGI	555544	11.1 1						AYNPR2921 G	861
						Balance	555544	11.11		
5	SHASHANK GUPTA	469474	9.39						AAJPG4076F	863
						Balance	469474	9.39		
6	DAIKO INFORMATION TECHNOLOGY PVT LTD	92307	1.85							799
						Balance	92307	1.85		799
7	SAJEL TRADE HOUSE PVT LTD	92307	1.85							798
						Balance	92307	1.85		798
8	BARIS REAL ESTATE PVT LTD	92307	1.85							797
						Balance	92307	1.85		797
9	DEEPAK KUMAR TYAGI	50000	1.00							800
						Balance	50000	1.00		800
10	GAYATRI AGARWAL	22900	0.46							815
						Balance	22900	0.46		815
End of Report										

iii) Change in Promoters' Shareholding (please specify, if there is no change):- - NO CHANGE

A1A PROM IND Huf			Shareholding As on 31/03/2020						Shareholding As on 31/03/2021								
Sr. No	Pan Number	Name of Shareholders	Demat		Physical					Physical						Category	
			Fully Paid	Partly Paid	Fully Paid	Partly Paid	Total Shares	% to Total Shares	Nominal Value	Fully Paid	Partly Paid	Total Shares	% to Total Shares	Nominal Value			
1	AFLPJ5292B	MOHIT JAIN	0	0	20000	0	20000	0.40	20000.00	0	0	40000	0	40000	0.80	40000.00	PROMOTERS - RESIDENT INDIAN
	Grand Total		0	0	20000	0	20000	0.4		0	0	40000	0	40000	0.8		

iv) Corporate Shareholding

B2A1 NON INSTITUTION Indian			Shareholding As on 31/03/2020						Shareholding As on 31/03/2021								
Sr. No	Pan Number	Name of Shareholders	Dem at		Physical					Physical						Category	
			Fully Paid	Partly Paid	Fully Paid	Partly Paid	Total Shares	% to Total Shares	Nominal Value	Fully Paid	Partly Paid	Fully Paid	Partly Paid	Total Shares	% to Total Shares	Nominal Value	
1	799	DAIKO INFORMATION TECHNOLOGY PVT LTD	0	0	92307	0	92307	1.85	92307.00	0	0	92307	0	92307	1.85	92307.00	BODIES CORPORATE DOMESTIC
2	798	SAJEL TRADE HOUSE PVT LTD	0	0	92307	0	92307	1.85	92307.00	0	0	92307	0	92307	1.85	92307.00	BODIES CORPORATE DOMESTIC
3	797	BARIS REAL ESTATE PVT LTD	0	0	92307	0	92307	1.85	92307.00	0	0	92307	0	92307	1.85	92307.00	BODIES CORPORATE DOMESTIC
4	AADCD 9304Q	DIVINUS PROMOTERS PVT LTD	0	0	0	0	0	0.00	0.00	21500	0	0	0	21500	0.43	215000.00	BODIES CORPORATE DOMESTIC

5	812	KPCORP CONSULTANTS PVT LTD	0	0	21500	0	21500	0.43	215000.00	0	0	21500	0	21500	0.43	215000.00	BODIES CORPORATE DOMESTIC
6	791	VIBHUTI ENTERPRISES PVT LTD	0	0	21500	0	21500	0.43	215000.00	0	0	21500	0	21500	0.43	215000.00	BODIES CORPORATE DOMESTIC
7	790	MIKER FINANCIAL CONSULTANTS PVT LTD	0	0	21500	0	21500	0.43	215000.00	0	0	21500	0	21500	0.43	215000.00	BODIES CORPORATE DOMESTIC
8	789	FESTINO VINCOM LTD	0	0	21500	0	21500	0.43	215000.00	0	0	21500	0	21500	0.43	215000.00	BODIES CORPORATE DOMESTIC
9	793	SUNCARE TRADERS LIMITED	0	0	21300	0	21300	0.43	213000.00	0	0	21300	0	21300	0.43	213000.00	BODIES CORPORATE DOMESTIC
10	835	J&P WEALTH COACH PRIVATE LIMITED	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	BODIES CORPORATE DOMESTIC
11	810	DIVINUS PROMOTERS PVT LTD	0	0	21500	0	21500	0.43	215000.00	0	0	0	0	0	0.00	0.00	BODIES CORPORATE DOMESTIC
	Grand Total		0	0	405731	0	405731	8.11		21500	0	384231	0	405731	8.11		

v) Shareholding of Directors and Key Managerial Personnel:

Sl. No.	Shareholding at the beginning of the year	Cumulative Shareholding during the year
	NIL	

B2C NON INSTITUTION HUF			Shareholding As on 31/03/2020							Shareholding As on 31/03/2021							
Sr. No	Pan Number	Name of Shareholders	Demat		Physical					Physical							Category
			Fully Paid	Partly Paid	Full y Paid	Pa rtl y Paid	Tot al Sha res	% to Tot al Sha res	Nomi nal Value	Full y Paid	Par tly Paid	Ful ly Paid	Par tly Paid	Tot al Sha res	% to Tot al Sha res	Nomi nal Value	
1	AAJHK2 958Q	KULBHUSHAN PARASHAR HUF	0	0	0	0	0	0.00	0.00	21700	0	0	0	21700	0.43	21700.00	RESIDENT HUF /APOS
2	850	NANJIBHAI BHOJABHAI PARMAR(HUF)	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	RESIDENT HUF /APOS
3	849	YOGESH NANJIBHAI PARMAR(HUF)	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	RESIDENT HUF /APOS
4	842	MANILAL NATHUBHAI MEHTA	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	RESIDENT HUF /APOS
5	837	PINANK P MEHTA	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	RESIDENT HUF /APOS
6	834	RANJEETSINGH R SOLANKI (HUF)	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	RESIDENT HUF /APOS
7	833	GHANSHYAM R SOLANKI (HUF)	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	RESIDENT HUF /APOS
8	832	DIPSINH R SOLANKI (HUF)	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	RESIDENT HUF /APOS
9	823	THOBHANI AMRUTLAL GORDHANBHAI (HUF)	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	RESIDENT HUF /APOS
10	822	THOBHANI JIGNESH AMRUTLAL (HUF)	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	RESIDENT HUF /APOS
11	709	MEHTA ASHISH (HUF)	0	0	10	0	10	0.00	100.00	0	0	10	0	10	0.00	100.00	RESIDENT HUF /APOS
12	806	KULBHUSHAN PARASHAR KARTA OF	0	0	21700	0	21700	0.43	21700.00	0	0	0	0	0	0.00	0.00	RESIDENT HUF /APOS
	Grand Total		0	0	21800	0	21800	0.44		21700	0	100	0	21800	0.44		

IV. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES -

S.NO.	Name of the Company	CIN/GLN	HOLDING/ SUBSIDIARY/ASSOCIATE	% of shares held	Applicable section
01	NIRVAZA ENTERPRISES PRIVATE LIMITED	U51109DL2011PTC226019	SUBSIDIARY	100%	2(87)(ii)

V. INDEBTEDNESS

Indebtedness of the Company including interest outstanding/accrued but not due for payment

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	NA	11,50,000	NA	11,50,000
ii) Interest due but not paid				
Interest accrued but not due				
Total (i+ii+iii)	NA	11,50,000	NA	11,50,000
Change in Indebtedness during the financial year				
➤ Addition	NA	(11,50,000)	NA	(11,50,000)
➤ Reduction				
Net Change	NA	(11,50,000)	NA	(11,50,000)
Indebtedness at the end of the financial year				
i) Principal Amount	NA	-	NA	-
ii) Interest due but not paid				

Interest accrued but not due				
Total (i+ii+iii)	NA	-	NA	-

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

Sl. no.	Particulars of Remuneration	Name of MD/WTD/ Manager				Total Amount
		
1.	Gross salary (a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961 (b) Value of perquisites u/s 17(2) Income-tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	NA	NA	NA	NA	NA
2.	Stock Option	NA	NA	NA	NA	NA
3.	Sweat Equity	NA	NA	NA	NA	NA
4.	Commission - as % of profit - others, specify...	NA	NA	NA	NA	NA
5.	Others, please specify	NA	NA	NA	NA	NA
	Total (A)	NA	NA	NA	NA	NA
	Ceiling as per the Act	NA	NA	NA	NA	NA

B. B. Remuneration to other directors: *NIL*

Sl. no.	Particulars of Remuneration	Name of Directors			Total Amount
		Vandana Gupta	Sumit Khandelwal	Jitender Singh Rathi	
	3. Independent Directors	Yes	Yes	Yes	
	<ul style="list-style-type: none"> • Fee for attending board committee meetings • Commission • Others, please specify 	9000	60000	35000	104000
	Total (1)	9000	60000	35000	104000
	4. Other Non-Executive Directors	NA	NA	NA	NA
	<ul style="list-style-type: none"> • Fee for attending board committee meetings • Commission • Others, please specify 	NA	NA	NA	NA
	Total (2)	NA	NA	NA	NA
	Total (B) = (1 + 2)	NA	NA	NA	NA
	Total Managerial Remuneration	NA	NA	NA	NA
	Overall Ceiling as per the Act	9000	60000	35000	104000

C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTD :

Sl. No.	Particulars of Remuneration	Key Managerial Personnel			
		CEO	Company Secretary	CFO	Total
1.	Gross salary (a) Salary as per provisions contained in	60000	420000	NA	480000

Sl. No.	Particulars of Remuneration	Key Managerial Personnel			
		CEO	Company Secretary	CFO	Total
	section 17(1) of the Income-tax Act, 1961 (b) Value of perquisites u/s 17(2) Income-tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961				
2.	Stock Option	NA	NA	NA	NA
3.	Sweat Equity	NA	NA	NA	NA
4.	Commission - as % of profit - others, specify...	NA	NA	NA	NA
5.	Others, please specify	NA	NA	NA	NA
	Total	60000	420000	NA	480000

VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES: NIL

Type	Section of the Companies Act	Brief Description	Details of Penalty/ Punishment / Compounding fees imposed	Authority [RD/NCL T/COURT]	Appeal made, if any (give Details)
A.COMPANY					
Penalty	NA	NA	NA	NA	NA
Punishment	NA	NA	NA	NA	NA
Compounding	NA	NA	NA	NA	NA
B. DIRECTORS					
Penalty	NA	NA	NA	NA	NA

Type	Section of the Companies Act	Brief Description	Details of Penalty/ Punishment / Compounding fees imposed	Authority [RD/NCL T/COURT]	Appeal made, if any (give Details)
Punishment	NA	NA	NA	NA	NA
Compounding	NA	NA	NA	NA	NA
C. OTHER OFFICERS IN DEFAULT					
Penalty	NA	NA	NA	NA	NA
Punishment	NA	NA	NA	NA	NA
Compounding	NA	NA	NA	NA	NA

**BY ORDER OF THE BOARD
FOR BHARAT EKANSH LIMITED**

**SD/-
RAHUL KUMAR VERMA
Director
DIN: 08363706**

**SD/-
VISHAL KUMAR SRIVASTAVA
Director
DIN: 08792936**

Place: New Delhi
Date:31.08.2021

ANNEXURE 3

MANAGEMENT DISCUSSION AND ANALYSIS REPORT

I. INDUSTRY STRUCTURE AND DEVELOPMENT:

The year gone by has been a period of unprecedented challenges and uncertainties caused by the pandemic. This was compounded by its cascading effect in every facet of the economy and the industry. The real estate industry too, witnessed changes. This was as a result of systemic structural reforms and policy changes. The residential segment in particular has exhibited a surge with the fundamental growth drivers falling into place. The industry remains cognizant of the evolving market conditions with developers exhibiting adaptability along with agility to respond to the current situation.

Bharat Ekansh Limited was an NBFC and engaged mainly in the business of providing loans and advances to various Corporates. The main objective of the Company was to finance Industrial Enterprises by way of making loans and advances to Industrial enterprises In India and to carry out all such activities as may be ancillary to the achievement of main objectives of the Company. The CoR (Certificate of Registration) of the Company has been cancelled by the Reserve Bank of India (RBI) by reason of non-maintenance of minimum Net Owned Fund (NOF) as prescribed by the RBI, the company is now focusing on its main activities i.e. Real estate and consultancy services as specified in main objects of the Company.

II. OPPORTUNITIES AND THREATS:

The sector uses the loans for various business activities ranging from the business of hire Purchase Company and to acquire, to provide on all type hire purchase basis of industrial and official plant, equipment machinery, vehicles, Agriculture, Handicrafts, Trading, Services, Shops, Livestock, and Production to others. As banks are unable to appraise the credit requirements of the micro and small businesses they are unable to extend credit facilities with collateral security. The banking system will not be able to meet this demand and a wide gap exists giving the Company an opportunity to grow in its financing of Small Business/ Industrial Loans. Major threat faced by Bharat Ekansh Limited would be circumstances of not being able to raise funds for its future business operations.

III. SEGMENT-WISE PERFORMANCE:

The Company is engaged in a segment i.e. Real estate and consultancy services. Details of performance have been provided in this report.

IV. OUTLOOK:

Bharat Ekansh Limited expects to improve its performance in financial year 2020-21 and hopes to grow at rate faster than the growth of bank credit. The approach would be to continue with the growth momentum while balancing risk. The Company will continue to invest in strengthening risk management practices; and in maintaining its investment in human resources to consolidate its position as a potentially big NRFC in India.

V. RISK MANAGEMENT:

Risk Management is an integral part of our Company's business strategy. A dedicated team is a part of the management processes governed by the senior management team. This team reviews compliance with risk policies, monitors risk tolerance limits, reviews and analyzes risk exposure related to specific issues and provides oversight of risk across the organization. The team nurtures a healthy and independent risk management function to avoid any kind of misappropriations in the Company. As part of the Risk Management framework, the management of Credit Risk, Market Risk, Operational Risk and Fraud Risk are placed under the Head - Risk. The Credit Risk management structure includes separate credit policies and procedures for various businesses. The risk policies define prudential limits, portfolio criteria, exceptional approval metrics, etc. and cover risk assessment for new product offerings.

Concentration Risk is managed by analyzing counter-party, industry sector, geographical region, single borrower and borrower group. Retail Finance credit approval is based on product / programs and monitoring is primarily done at the portfolio level across products and programs. Casual analysis is carried out and corrective actions are implemented on key risk indicators. A Senior Management oversight committee meets periodically to review the operational risk profile of the organization. Fraud risks are mitigated through a fraud risk management team.

VI. INTERNAL CONTROL SYSTEMS AND THEIR ADEQUACY:

The Company's internal control system is designed to ensure operational efficiency, protection and conservation of resources, accuracy and promptness in financial reporting and compliance with laws and regulations. The internal control system is supported by an internal audit process for reviewing the adequacy and efficiency of the Company's internal controls, including its systems and processes and compliance with regulations and procedures. Internal Audit Reports are discussed with the Management and are reviewed by the Audit Committee of the Board which also reviews the adequacy and effectiveness of the internal controls in the Company. The Company's internal control system is commensurate with the size, nature and operations of the Company.

VII. DISCUSSION ON FINANCIAL PERFORMANCE WITH RESPECT TO OPERATIONAL PERFORMANCE.

The financial performance of the Company during the year under reference was reasonably good. For detailed Information, please refer to Directors' Report, which forms part of this Annual Report,

VIII. MATERIAL DEVELOPMENTS IN HUMAN RESOURCES! INDUSTRIAL RELATIONS FRONT, INCLUDING NUMBER OF PEOPLE EMPLOYED:

We recognize people as our most valuable asset and we have built an open, transparent and meritocratic culture to nurture this asset. Talent Management is a key people planning tool that provides an integrated means of identifying, selecting, developing and retaining top talent within our Organization. Attrition has been managed well and has been below industry benchmarks. Bharat Ekansh Limited has kept a sharp focus on Employee Engagement. We follow 360 degree feedback to ensure the satisfaction of our people. We have a strong system of grievance handling too. No concern of our people goes without addressing. We strive for excellence by thriving on Bharat Ekansh Limited's positivity.

For and on Behalf of Board of
Bharat Ekansh Limited
SD/-

Rahul Kumar Verma
(Director)
DIN: 08363706

Date: 31.08.2021

Place: Delhi

SD/-

Vishal Kumar Srivastava
(Director)
DIN: 08792936

ANNEXTURE IV
AUDIT COMMITTEE POLICY

1. Objectives

The objectives of the audit committee (the "committee") of the board of directors (the "Board") of Bharat Ekansh Limited (the "Company") are to assist the Board with **oversight** of following:

- i) the accuracy, integrity and transparency of the Company's financial statements with adequate and timely disclosures
- ii) compliance with legal and regulatory requirements,
- iii) the Company's independent auditors' qualifications and independence, and
- iv) the performance of the Company's independent auditors and internal audit function.

The role, responsibilities and powers of the committee shall include matters set out in this charter and such other items as may be prescribed by applicable laws as amended or by the Board in compliance with applicable laws from time to time.

2. Process

The committee fulfills its objective through the following process:

- i. Ensuring an effective and independent internal audit function which works to provide assurance regarding the adequacy and operation of internal controls and processes intended to safeguard the Company's assets; effective and efficient use of the Company's resources; and timely and accurate recording of all transactions.
- ii. Meeting the independent auditor in a financial year to discuss key observations relating to the financial statement for the relevant period.
- iii. Providing an independent channel of communication for the Compliance Officer, internal auditor and the independent auditor.
- iv. Inviting members of the management, and at its discretion, external experts in legal, financial and technical matters, to provide advice and guidance.
- v. Providing periodic feedback and reports to the Board.
- vi. Periodically reviewing its own charter, structure, processes and membership.

3. Powers

The audit committee shall have, inter alia, the following powers:

- i. To investigate any activity within its terms of reference.
- ii. To seek information from any employee.
- iii. To obtain outside legal or other professional advice as required.
- iv. To institute special investigations into any matter provided in this charter or referred to it by the Board, with full access to the internal auditors, chairperson of the Board, management and the independent auditor, as well as all books, records, facilities and personnel of the Company.
- v. To secure attendance of the auditors, internal auditor, and the head of finance and of outsiders with relevant expertise.

4. Responsibilities

The Committee shall have the following authorities and responsibilities

4.1 Relating to Financial Statements

i) Reviewing with management and the independent auditor the annual audited financial statements and the quarterly audited/unaudited financial statements, and recommendation to the Board for adoption and for filing annual reports. Such review should primarily focus on:

- Any changes in accounting policies and practices
- Pre-approval/approval/disclosure of any related party transactions
- Significant accounting entries based on judgment of the management
- Qualifications, if any, in draft audit report
- Matters required to be included in the Director's Responsibility Statement to be included in the Board's report under Section 134 (3)(c) of the Companies Act, 2013
- Significant adjustments and/or provisions arising out of audit
- Compliance with accounting standards
- Compliance with stock exchange and other legal requirements concerning financial statements

ii) Reviewing the management discussion and analysis of financial condition and results of operations;

iii) Evaluation of internal financial controls. Oversight of the company's financial reporting process and disclosure of financial information to ensure that the financial statements are accurate, adequate and reliable.

iv) Review financial statements and investments made by any material unlisted subsidiary.

v) Reviewing, with the management, and independent auditors, any prospectus or such other document including financial statements contained therein, proposed to be issued by the Company for the purpose of raising capital, including debt.

vi) Review, pre-approve, approve or subsequently modify transactions of the Company with related parties.

4.2 Relating to Independent Auditors

i) Make recommendations to the Board for appointment, retention, termination, remuneration/compensation, and terms of appointment of an independent accounting firm to act as the Company's independent auditor.

ii) Review with independent auditors, the nature and scope of audit coverage, to ascertain adequacy and appropriateness.

iii) Review management letters/letters of internal control weaknesses issued by the independent auditors.

iv) Review with the internal auditor, any audit problems and the management's response.

v) Approval of all audit and permitted non-auditing services to be provided by the Independent auditor to the Company. For the purpose of this clause, 'non-auditing services' shall mean any

professional services provided to the Company by the independent auditor, other than those provided to the Company in connection with an audit or a review of the financial statements of the Company.

vi) Annually obtaining and reviewing a report by the independent auditor that describes :

- ❖ the independent auditor's internal quality control procedures,
- ❖ any material issues raised by the most recent internal quality-control review, or peer review, of the independent auditor or by any inquiry or investigation by governmental or professional authorities, within the preceding five years, regarding any independent audit performed by the independent auditor, and any steps taken to deal with any such issues, and
- ❖ to assess the auditor's independence- all relationships between the independent auditor and the Company at least annually, to evaluate the qualifications, performance and independence of the Company's independent auditors

vii) Conducting a post-audit review of the financial statements and audit findings, including any significant suggestions for improvements provided to the management by the independent auditor or the internal auditor.

viii) Assist management in carrying out management's obligation of fostering a culture of co-operation and openness between management, the committee, external auditors, internal auditors and other internal and external compliance functions.

4.3 Relating to Internal Audit Function

- i) Reviewing the adequacy of internal audit function, including its coverage and frequency of internal audit.
- ii) Reviewing the appointment, removal and terms of remuneration of the internal auditor.
- iii) Discussing with internal auditors any significant findings relating to internal control weaknesses and follow up thereon. Reviewing internal audit reports relating to internal control weaknesses.
- iv) Reviewing the findings of any investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature.

4.4 Relating to Internal Controls

Reviewing with the management, performance of independent and internal auditors and the adequacy of internal control systems

4.5 Relating to Integrity & Compliance Function of the Company

- i) Review of compliance of the Company with the requirements of the SEBI and such other applicable regulatory bodies.
- ii) Review of compliance with the Company's Code of Conduct and Ethics
- iii) Review of Company's compliance with employee benefit plans.
- iv) Establish and review procedures for receiving, retaining and treating complaints received by the Company regarding accounting, internal accounting controls or auditing matters and procedures for protection of employees and others who raise concerns through the whistleblower mechanism, including direct access to the chairperson of the audit committee in appropriate or exceptional cases.

4.6 Other Responsibilities

- i) Review, in conjunction with legal counsel, any legal matters that could have a significant impact on the Company's financial statements. Review, in conjunction with management and the independent auditor, any correspondence with regulators or governmental agencies and any published reports that raise material issues regarding the Company's financial statements or accounting policies. As appropriate, engage independent counsel or other advisors as it deems necessary or appropriate to carry out its duties. The committee shall set the compensation, and oversee the work of, any independent counsel or other advisors retained by it. The Company will provide appropriate funding, as determined by the committee, to pay the independent auditor, any other registered public accounting firm and any independent counsel and any other outside advisors hired by the committee and any administrative expenses of the committee that are necessary or appropriate in carrying out its activities.
- ii) Oversee and manage the Company's risk assessment and risk management policies.
- iii) Approval of appointment of the chief financial officer after assessing the qualifications, experience and background, etc. of the candidate.
- iv) Periodically report to the Board or Committee of the Board inter alia all significant matters that have come to the knowledge of the Audit Committee, which impinge on internal controls, financial statements, policies and statutory/regulatory compliances.
- v) Set hiring policies with regard to employees and former employees of the independent auditor and oversee compliance with such policies.
- vi) Monitoring of and review with the management of end use of funds raised through issuances (public issue, rights issue, preferential issue etc.) and related matters, and making appropriate recommendations to the Board.
- vii) Scrutinize inter-corporate loans and investments.
- viii) Carry out valuation of undertakings or assets of the Company, wherever it is necessary.
- ix) Look into reasons for substantial defaults in payment to the depositors, debenture holders, shareholders (in case of non-payment of declared dividend) and creditors (if any).

5. Composition

- i) The committee shall comprise a minimum of three directors forming majority of Independent Directors.
- ii) Each member of the committee will be able to read and understand fundamental financial statements and otherwise comply with the financial literacy requirements of the Listing Agreement.
- iii) One of the members shall be elected as the chairperson, either by the entire Board or by the members themselves, by majority vote. The chairperson of the committee shall be present at Annual General Meetings to answer shareholder queries.
- iv) The members of the committee shall be elected by the Board, and shall continue until their successors are duly elected.

v) The Company Secretary shall act as the secretary to the committee.

6. Disclosure Requirements.

i) The committee charter should be published on the Company's website.

ii) The committee shall disclose in the Company's annual reports filed with regulators for each fiscal year whether or not, with respect to the concerned fiscal year:

- The committee has reviewed the audited financial statements with the management, including a discussion of the quality of the accounting principles as applied, and significant judgments affecting the Company's Financial Statement.
- The independent auditors have discussed with the committee their judgments of the quality of those principles as applied and judgments referred to above under the circumstances.
- The members of the committee have discussed among themselves, without the management of Independent Auditors being present, the information disclosed to committee as described above.
- The committee, in reliance on the review and discussions conducted with the management and the independent auditors pursuant to the requirements above, believes that the Company's financial statements are fairly presented in conformity all material respects.
- The committee has satisfied its responsibilities in compliance with its charter

iii) The committee shall report to the shareholders as required by applicable law

7. Meetings and Reports.

i) The committee shall meet as number of times as may be required. Meetings may be in person or.

ii) The committee shall meet separately with the management, with the internal auditors and with the independent auditors.

iii) The committee shall undertake an annual performance evaluation of its effectiveness and submit it to the Board.

iv) The committee shall report regularly to the Board with respect to the committee's activities and receive feedback and direction from the Board on such activities. Committee reports shall include any significant issues that arise with respect to the quality or integrity of the Company's financial statements, the Company's compliance with legal or regulatory requirements, the performance of the internal audit function or the performance and independence of the Company's independent auditor, as applicable, with recommendations being made to the Board by the committee as appropriate.

v) The committee shall facilitate the open flow of information and cooperation with other committees of the Board.

vi) The committee shall assess its own performance annually.

8. Delegation of Authority

The committee may delegate to one or more designated members of the committee the authority to pre-approve audit and permissible non-audit services, provided such pre-approval decision is presented to the full audit committee at its scheduled meetings.

NOMINATION AND REMUNERATION POLICY

INTRODUCTION

At all levels and all times monetary compensation has been if not the sole but the most important motivational aspect for getting the job fulfilled under any given business scenario.

It is the endeavor of Bharat Ekansh Limited ("Company") that its Nomination & Remuneration Policy should represent the mode in which the Company carries out its business practices i.e. fair, transparent, inclusive and flexible.

The Company strives that its Remuneration Policy should attract, motivate, improve productivity and retain manpower, by creating a congenial work environment, encouraging initiatives, personal growth and team work, and inculcating a sense of belonging and involvement, besides offering appropriate remuneration packages.

This Nomination and Remuneration Policy applies to Directors, Key Managerial Personnel (KMP), Senior Management and other employees of the Company.

In pursuance of the Company's policy to consider human resources as its invaluable assets, to pay equitable remuneration to all Directors, Key Managerial Personnel and Employees of the Company, to harmonize the aspirations of human resources consistent with the goals of the Company and in terms of the provisions of the Companies Act, 2013, this policy on Nomination and Remuneration of Directors, Key Managerial Personnel (KMP) and Senior Management has been formulated by the Nomination and Remuneration/Compensation Committee ("NRC") and reconstituted by the Board of Directors of the Company.

CONSTITUTION OF COMMITTEE:

The Board of Directors of the Company (the Board) shall constitute the committee to be known as the Nomination and Remuneration/Compensation Committee consisting of three or more non-executive directors out of which not less than one-half are independent directors. The Chairman of the Committee is an Independent Director. However, the chairperson of the company (whether executive or non-executive) may be appointed as a member of the Nomination and Remuneration Committee but shall not chair such Committee."

OBJECTIVE

The Nomination and Remuneration/Compensation Committee and this Policy shall be in compliance with Section 178 of the Companies Act, 2013 read along with the applicable rules thereto. The objective of this policy is to lay down a framework in relation to remuneration of Directors, KMP, Senior Management Personnel and other Employees. The Key Objectives of the Committee would be:

- Ensuring appropriate induction & training program: The Committee shall ensure that there is an appropriate induction & training program in place for new Directors, KMPs and members of Senior Management and review its effectiveness;
- Formulate the criteria for appointment as a Director: The Committee shall formulate criteria, and review them on an ongoing basis, for determining qualifications, skills, experience, expertise, qualities, positive attributes required to be a Director of the Company.

- Identify persons who are qualified to be Directors / Independent Directors / KMPs / SMPs: The Committee shall identify persons, who are qualified to become Directors / Independent Directors / KMPs / SMPs and who satisfy the criteria laid down under the provisions of the Companies Act, 2013, rules made there under,
- Nominate candidates for Directorships subject to the approval of Board: The Committee shall recommend to the Board the appointment of potential candidates as Non- Executive Director or Independent Director or Executive Director, as the case may be.
- Evaluate the performance of the Board: The Committee shall determine a process for evaluating the performance of every Director, Committees of the Board and the Board, on an annual basis.
- Remuneration of Managing Director / Directors: The Committee shall ensure that the tenure of Executive Directors and their compensation packages are in accordance with applicable laws, in line with the Company's objectives, shareholders' interests and comparable with industry standards.
- Review performance and compensation of Non-Executive Independent Directors: The Committee shall review the performance of the Non-Executive Independent Directors of the Company. The Committee shall ensure that the Non- Executive Independent Director(s) may receive remuneration by way of sitting fees for attending the meetings of Board or Committee(s), thereof provided that the amount of such fees shall be subject to ceiling / limits as provided under Companies Act, 2013 and rules made there under or any other enactment, for the time being in force.
- Review performance and compensation of KMPs / Senior management personnel known hereafter known as (SMPs) etc. The Committee shall review the performance of the Non-Executive Independent Directors of the Company. The Committee shall ensure that the remuneration to be paid to KMPs / SMPs shall be based on the experience, qualifications and expertise of the personnel and governed by the limits, if any, prescribed under the Companies Act, 2013 and rules made there under or any other enactment, for the time being in force.

APPLICABILITY

- a) Directors (Executive and Non-Executive)
- b) Key Managerial Personnel
- c) Senior Management Personnel;
- d) Other Employees

DEFINITIONS:

"Act" means the Companies Act, 2013 and Rules framed there under, as amended from time to time.

"Board" means Board of Directors of the Company.

"Directors" mean Directors of the Company.

"Key Managerial Personnel" means

- i. Managing Director, or Chief Executive Officer or Manager and in their absence, a Whole-time Director;

- ii. Chief Financial Officer;
- iii. Company Secretary; and
- iv. such other officer as may be prescribed.

'Other employees' means all employees other than the Directors, KMPs and the Senior Management Personnel.

'Policy or This Policy' means, "Nomination and Remuneration Policy."

"Senior Management" means Senior Management means the personnel of the Company who are members of its core management team excluding Board of Directors comprising all members of management one level below the executive directors, including the functional heads.

Appointment Criteria and Qualifications:

a) The Committee shall identify and ascertain the integrity, qualification, expertise and experience of the person for appointment as Director, KMP or at Senior Management level and recommend to the Board his / her appointment.

b) A person should possess adequate qualification, expertise and experience for the position he / she is considered for appointment. The Committee has discretion to decide whether qualification, expertise and experience possessed by a person is sufficient / satisfactory for the concerned position.

c) The Company shall not appoint or continue the employment of any person as Whole Time Director who has attained the age of seventy years. Provided that the term of the person holding this position may be extended beyond the age of seventy years with the approval of shareholders by passing a special resolution based on the explanatory statement annexed to the notice for such motion indicating the justification for extension of appointment beyond seventy years.

Term / Tenure:

a) Managing Director/Whole-time Director:

The Company shall appoint or re-appoint any person as its Executive Chairman, Managing Director or Executive Director for a term not exceeding five years at a time. No reappointment shall be made earlier than one year before the expiry of term.

b) Independent Director:

An Independent Director shall hold office for a term up to five consecutive years on the Board of the Company and will be eligible for re-appointment on passing of a special resolution by the Company and disclosure of such appointment in the Board's report.

No Independent Director shall hold office for more than two consecutive terms of upto maximum of 5 years each, but such Independent Director shall be eligible for appointment after expiry of three years of ceasing to become an Independent Director. Provided that an Independent Director shall not, during the said period of three years, be appointed in or be associated with the Company in any other capacity, either directly or indirectly.

Evaluation:

The Committee shall carry out evaluation of performance of every Director, KMP and Senior Management Personnel at regular interval (yearly).

Removal:

Due to reasons for any disqualifications mentioned in Companies Act, 2013 or under any other applicable Act, Rules and Regulations there under, the Committee may recommend, to the Board with reasons recorded in writing, removal of a Director, KMP or Senior Management Personnel subject to the provisions and compliance of the said Act, Rules and Regulations.

Retirement:

The Directors, KMP and Senior Management Personnel shall retire as per the applicable provisions of the Act and the prevailing policy of the Company. The Board will have the discretion to retain the Director, KMP, Senior Management Personnel in the same position/remuneration or otherwise even after attaining the retirement age, for the benefit of the Company.

BOARD DIVERSITY

The Board shall consist of such number of Directors, including atleast one women Director and not less than fifty percent of the Board of Directors comprising non-executive directors, as is necessary to effectively manage the Company of its size.

The Committee will lead the process for Board appointments. All Board appointments will be based on the skills, diverse experience, independence and knowledge which the Board as a whole requires to be effective. The Committee shall seek to address Board vacancies by actively considering candidates that bring a diversity of background and opinion from amongst those candidates with the appropriate background and industry or related expertise and experience. The candidates will be considered against objective criteria, having due regard to the benefits of diversity on the Board.

Additionally the Board may consider appointment of experts from various specialized fields such as finance, law, information technology, corporate strategy, marketing and business development, international business, operations management etc. so as to bring diversified skill sets on board or succeed any outgoing director with the same expertise.

POLICY FOR REMUNERATION TO DIRECTORS/KMP/SENIOR MAMAGEMENT PERSONNEL:

1. Remuneration to Managing/ Whole-Time / Executive/Managing Director, KMP and Senior Management Personnel:

The Remuneration/ Compensation/ Commission etc. to be paid to Director/Managing Director etc. shall be governed as per provisions of the Companies Act, 2013 and rules made there under or any other enactment for the time being in force.

2. Remuneration to Non-Executive/Independent Director:

The Non-Executive Independent Director may receive sitting fee and out of pocket expenses as per the provisions of the Companies Act, 2013. The amount of sitting fees shall be subject to limits as provided under the Companies Act, 2013 and rules made there under or any other enactment for the time being in force.

3. Remuneration to other Employees:

- Apart from the Directors, KMPs and Senior Management Personnel, the remuneration for rest of the employees is determined on the basis of the role and position of the individual employee, including professional experience, responsibility, job complexity and market conditions.
- The various remuneration components, basic salary, allowances, perquisites etc. may be combined to ensure an appropriate and balanced remuneration package.
- The annual increments to the remuneration paid to the employees shall be determined based on the appraisal carried out by various departments. Decision on Annual Increments shall be made on the basis of this appraisal.

Nomination Duties:

The duties of the Committee in relation to nomination matters include:

- Ensuring that there is an appropriate induction & training programme in place for new Directors and members of Senior Management and reviewing its effectiveness;
- Ensuring that on appointment to the Board, Non-Executive Directors receive a formal letter of appointment in accordance with the Guidelines provided under the Companies Act, 2013;
- Identifying and recommending Directors who are to be put forward for retirement by rotation.
- Determining the appropriate size, diversity and composition of the Board;
- Setting a formal and transparent procedure for selecting new Directors for appointment to the Board;
- Developing a succession plan for the Board and Senior Management and regularly reviewing the plan;
- Evaluating the performance of the Board members and Senior Management in the context of the Company's performance from business and compliance perspective;
- Making recommendations to the Board concerning any matters relating to the continuation in office of any Director at any time including the suspension or termination of service of an Executive Director as an employee of the Company subject to the provision of the law and their service contract.
- Delegating any of its powers to one or more of its members or the Secretary of the Committee;
- Recommend any necessary changes to the Board.
- Considering any other matters as may be requested by the Board.

Remuneration Duties:

The duties of the Committee in relation to remuneration matters include:

- to consider and determine the Remuneration Policy, based on the performance and also bearing in mind that the remuneration is reasonable and sufficient to attract retain and motivate members of the Board and such other factors as the Committee shall deem appropriate all elements of the remuneration of the members of the Board.
- to approve the remuneration of the Senior Management including key managerial personnel of the Company maintaining a balance between fixed and incentive pay reflecting short and long term performance objectives appropriate to the working of the Company.
- to delegate any of its powers to one or more of its members or the Secretary of the Committee.
- to consider any other matters as may be requested by the Board;

REVIEW AND AMENDMENT:

1. The Nomination and Remuneration Committee or the Board may review the Policy as and when it deems necessary.
2. This Policy may be amended or substituted by the Nomination and Remuneration Committee or by the Board as and when required and also by the Compliance Officer where there are any statutory changes necessitating the change in the policy. However, no such amendment or modification will be binding on the Directors and employees unless the same is communicated to them.

DIRECTOR AND CFO CERTIFICATION
AS PER SEBI (LODR) REGULATIONS, 2015

a. I, Vishal Kumar Srivastava, Director & CFO have reviewed financial statements and the Cash Flow Statement for the year 2020-21 and that to the best of our knowledge and belief:

i) these statements do not contain any materially untrue statement or omit any material fact or contain statements that might be misleading;

ii) these statements together present a true and fair view of the company's affairs and are in compliance with existing accounting standards, applicable laws and regulations.

b. There are to the best of our knowledge and belief, no transactions entered into by the company during the year which are fraudulent, illegal or violative of the company's code of conduct.

c. We accept the responsibility for establishing and maintaining internal controls and that we have evaluated the effectiveness of the internal control systems of the company and we have disclosed to the auditors and the Audit Committee, deficiencies in the design or operation of the internal controls, if any, of which we are aware and the steps we have taken or propose to take to rectify these deficiencies.

d. We have indicated to the auditors and the Audit Committee:

i) significant changes in internal control during the year;

ii) significant changes in accounting policies during the year and that the same have been disclosed in the notes of the financial statements; and

iii) instances of significant fraud of which we have become aware and the involvement therein, if any, of the management or an employee having a significant role in the company's internal control system.

For and on Behalf of Board of
Bharat Ekansh Limited

SD/-

Rahul Kumar Verma
(Director)
DIN: 08363706

SD/-

Vishal Kumar Srivastava
(Director)
DIN: 08792936

DECLARATION

I, Vishal Kumar Srivastava, Director & CFO of the Company confirm and certify that the members of the Board of Directors and senior management personnel have affirmed compliance with the code of conduct of Board of directors and senior management for the financial year 2020-21.

For Bharat Ekansh Limited

SD/-

Vishal Kumar Srivastava

Director & CFO

ANNEXTURE 5

Form No. AOC-2

(Pursuant to clause (h) of sub-section (3) of section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014)

Form for disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub-section (1) of section 188 of the Companies Act, 2013 including certain arms length transactions under third proviso thereto

1. Details of contracts or arrangements or transactions not at arm's length basis	Details
<p>(a) Name(s) of the related party and nature of relationship</p> <p>(b) Nature of contracts/arrangements/transactions</p> <p>(c) Duration of the contracts / arrangements/transactions</p> <p>(d) Salient terms of the contracts or arrangements or transactions including the value, if any</p> <p>(e) Justification for entering into such contracts or arrangements or transactions</p> <p>(f) date(s) of approval by the Board</p> <p>(g) Amount paid as advances, if any:</p> <p>(h) Date on which the special resolution was passed in general meeting as required under first proviso to section 188</p>	N.A. (there is no contracts or arrangements or transactions not at Arm's length basis.)
<p>2. Details of material contracts or arrangement or transactions at arm's length basis</p> <p>(a) Name(s) of the related party and nature of relationship</p> <p>(b) Nature of contracts/arrangements/transactions</p> <p>(c) Duration of the contracts / arrangements/transactions</p> <p>(d) Salient terms of the contracts or arrangements or transactions including the value, if any:</p> <p>(e) Date(s) of approval by the Board, if any:</p> <p>(f) Amount paid as advances, if any:</p>	N.A. (there is no material related party contracts or arrangements or transactions at Arm's length basis.)

For and on Behalf of Board of
Bharat Ekansh Limited

SD/-

Rahul Kumar Verma
(Director)
DIN: 08363706

SD/-

Vishal Kumar Srivastava
(Director)
DIN: 08792936

ANNEXTURE VI

DECLARATION OF INDEPENDENCE

To
The Board of Directors
BHARAT EKANSH LIMITED
PLOT 586, Pocket C,
IFC, Ghazipur, NEW DELHI 110096

Sub: Declaration of independence under SEBI (LODR) Regulations, 2015 and sub-section (6) of section 149 of the Companies Act, 2013.

I, Jitender Singh Rathi, hereby certify that I am a Non-Executive - Independent Director of Bharat Ekansh Limited, and comply with all the criteria of independent director as envisaged in SEBI (LODR) Regulations, 2015 and the Companies Act, 2013.

I certify that:

- I possess relevant expertise and experience to be an independent director in the Company;
- I am/was not a promoter of the company or its holding, subsidiary or associate company;
- I am not related to promoters / directors / persons occupying management position at the board level or level below the board in the company, its holding, subsidiary or associate company;
- Apart from receiving director sitting fees / remuneration, I have/had no pecuniary relationship / transactions with the company, its promoters, its directors, its senior management or its holding, subsidiary or associate company, or their promoters, or directors, during the two immediately preceding financial years or during the current financial;
- none of my relatives has or had any pecuniary relationship or transaction with the company, its holding, subsidiary or associate company, or their promoters, or directors, amounting to 2% or more of its gross turnover or total income or Rs. 50 Lacs or such higher amount as may be prescribed, whichever is lower, during the two immediately preceding financial years or during the current financial year;
- Neither me nor any of my relatives:
 - a) holds or has held the position of a key managerial personnel or is or has been employee/executive of the company or its holding, subsidiary or associate company in any of the three financial years immediately preceding the financial year;
 - b) is or has been an employee or proprietor or a partner, in any of the three financial years immediately preceding the financial year of;
 - a. a firm of auditors or company secretaries in practice or cost auditors of the company or its holding, subsidiary or associate company; or
 - b. any legal or a consulting firm that has or had any transaction with the company, its holding, subsidiary or associate company amounting to 10% or more of the gross turnover of such firm;
 - c) holds together with my relatives 2% or more of the total voting power of the company; or
 - d) is a Chief Executive or director, by whatever name called, of any nonprofit organization that receives 25% or more of its receipts from the company, any of its promoters, directors or its holding, subsidiary or associate company or that holds 2% or more of the total voting power of the company; or

- I am not a material supplier, service provider or customer or a lessor or lessee of the company;
- I am not less than 21 years of age.

Thanking You

**SD/-
Jitender Singh Rathi
DIN: 07562149**

DECLARATION OF INDEPENDENCE

To
The Board of Directors
BHARAT EKANSH LIMITED
PLOT 586, Pocket C,
IFC, Ghazipur, NEW DELHI 110096

Sub: Declaration of independence under SEBI (LODR) Regulations, 2015 and sub-section (6) of section 149 of the Companies Act, 2013.

I, Vandana Gupta, hereby certify that I am a Non-Executive - Independent Director of Bharat Ekansh Limited, and comply with all the criteria of Independent director as envisaged in SEBI (LODR) Regulations, 2015 and the Companies Act, 2013.

I certify that:

- I possess relevant expertise and experience to be an Independent director in the Company;
- I am/was not a promoter of the company or its holding, subsidiary or associate company;
- I am not related to promoters / directors / persons occupying management position at the board level or level below the board in the company, its holding, subsidiary or associate company;
- Apart from receiving director sitting fees / remuneration, I have/had no pecuniary relationship / transactions with the company, its promoters, its directors, its senior management or its holding, subsidiary or associate company, or their promoters, or directors, during the two immediately preceding financial years or during the current financial;
- none of my relatives has or had any pecuniary relationship or transaction with the company, its holding, subsidiary or associate company, or their promoters, or directors, amounting to 2% or more of its gross turnover or total income or Rs. 50 Lacs or such higher amount as may be prescribed, whichever is lower, during the two immediately preceding financial years or during the current financial year;
- Neither me nor any of my relatives:
 - a) holds or has held the position of a key managerial personnel or is or has been employee/executive of the company or its holding, subsidiary or associate company in any of the three financial years immediately preceding the financial year;
 - b) is or has been an employee or proprietor or a partner, in any of the three financial years immediately preceding the financial year of;
 - a. a firm of auditors or company secretaries in practice or cost auditors of the company or its holding, subsidiary or associate company; or
 - b. any legal or a consulting firm that has or had any transaction with the company, its holding, subsidiary or associate company amounting to 10% or more of the gross turnover of such firm;
 - c) holds together with my relatives 2% or more of the total voting power of the company; or
 - d) is a Chief Executive or director, by whatever name called, of any nonprofit organization that receives 25% or more of its receipts from the company, any of its promoters, directors or its holding, subsidiary or associate company or that holds 2% or more of the total voting power of the company; or

- I am not a material supplier, service provider or customer or a lessor or lessee of the company;
- I am not less than 21 years of age.

Thanking You

**SD/-
Vandana Gupta
DIN: 00013488**

DECLARATION OF INDEPENDENCE

To
The Board of Directors
BHARAT EKANSH LIMITED
PLOT 586, Pocket C,
IFC, Ghazipur, NEW DELHI 110096

Sub: Declaration of independence under SEBI (LODR) Regulations, 2015 and sub-section (6) of section 149 of the Companies Act, 2013.

I, Sumit Khandelwal, hereby certify that I am a Non-Executive - Independent Director of Bharat Ekansh Limited, and comply with all the criteria of Independent director as envisaged in SEBI (LODR) Regulations, 2015 and the Companies Act, 2013.

I certify that:

- I possess relevant expertise and experience to be an Independent director in the Company;
- I am/was not a promoter of the company or its holding, subsidiary or associate company;
- I am not related to promoters / directors / persons occupying management position at the board level or level below the board in the company, its holding, subsidiary or associate company;
- Apart from receiving director sitting fees / remuneration, I have/had no pecuniary relationship / transactions with the company, its promoters, its directors, its senior management or its holding, subsidiary or associate company, or their promoters, or directors, during the two immediately preceding financial years or during the current financial;
- none of my relatives has or had any pecuniary relationship or transaction with the company, its holding, subsidiary or associate company, or their promoters, or directors, amounting to 2% or more of its gross turnover or total income or Rs. 50 Lacs or such higher amount as may be prescribed, whichever is lower, during the two immediately preceding financial years or during the current financial year;
- Neither me nor any of my relatives:
 - a) holds or has held the position of a key managerial personnel or is or has been employee/executive of the company or its holding, subsidiary or associate company in any of the three financial years immediately preceding the financial year;
 - b) is or has been an employee or proprietor or a partner, in any of the three financial years immediately preceding the financial year of;
 - a. a firm of auditors or company secretaries in practice or cost auditors of the company or its holding, subsidiary or associate company; or
 - b. any legal or a consulting firm that has or had any transaction with the company, its holding, subsidiary or associate company amounting to 10% or more of the gross turnover of such firm;
 - c) holds together with my relatives 2% or more of the total voting power of the company; or
 - d) is a Chief Executive or director, by whatever name called, of any nonprofit organization that receives 25% or more of its receipts from the company, any of its promoters, directors or its holding, subsidiary or associate company or that holds 2% or more of the total voting power of the company; or

- I am not a material supplier, service provider or customer or a lessor or lessee of the company;
- I am not less than 21 years of age.

Thanking You

SD/-

Sumit Khandelwal

DIN: 08388888