



# Best Agrolife Limited

CIN : L74110DL1992PLC116773

23<sup>rd</sup> May, 2023

To  
The Manager,  
Compliance Department  
BSE Ltd.  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai-400001

**SCRIP CODE: 539660**

**SCRIP ID: BESTAGRO**

**Sub: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2023**

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, please find enclosed herewith the Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2023.

Submitted for your information and record.

Thanking You,  
Yours faithfully,

For Best Agrolife Limited

  
Astha Wahi  
CS & Compliance Officer





**RAKHI RANI**  
Practicing Company Secretary

G-1/494, Dal Mill Road, Uttam Nagar,  
New Delhi-110059  
Mobile: 9716691068  
E-Mail: csrakhi87@gmail.com

**ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR  
ENDED 31<sup>ST</sup> MARCH, 2023**

**(Pursuant to Regulation 24A of the Securities and Exchange Board of India  
(Listing Obligations and Disclosure Requirements) Regulations, 2015)**

To,

**The Board of Directors  
BEST AGROLIFE LIMITED  
B-4, BHAGWAN DASS NAGAR,  
EAST PUNJABI BAGH,  
NEW DELHI – 110026**

I, Rakhi Rani, a Practicing Company Secretary, have examined:

- (a) All the documents and records made available to me and explanation provided By **BEST AGROLIFE LIMITED** (“the listed entity”),
- (b) The filings/ submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity,
- (d) any other document/filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31<sup>st</sup> March, 2023 (“Review Report”) in respect of compliance with the provisions of:
  - (a) The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
  - (b) The Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- (a) Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - **Not applicable as there were no reportable events during the financial year under review.**
- (c) Securities Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



*Rakhi*

(d) Securities Exchange Board of India (Buyback of Securities) Regulations, 2018; - **Not applicable as there were no reportable events during the financial year under review.**

(e) Securities Exchange Board of India (Share Based Employee Benefits) Regulations, 2014/ SEBI (Share Based Employee Benefits & Sweat Equity) Regulations, 2021; - **Not applicable as there were no reportable events during the financial year under review.**

(f) Securities Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008/ SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021, as applicable - **Not applicable as there were no reportable events during the financial year under review.**

(g) Securities Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013/ SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021, as applicable - **Not applicable as there were no reportable events during the financial year under review.**

(h) Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) Securities Exchange Board of India (Depositories and Participant) Regulations, 2018; and

(j) other regulations as applicable and circulars / guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period the compliance status of the listed entity is appended below:

Sr. No.	Particulars	Compliance status (Yes/ No/ NA)	Observations/ Remarks by PCS*
1.	<u>Secretarial Standards:</u>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	
2.	<u>Adoption and timely updation of the Policies:</u>  • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	
3.	<u>Maintenance and disclosures on Website:</u>  • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website	Yes	
4.	<u>Disqualification of Director:</u>  None of the Director of the Company are disqualified	Yes	



	under Section 164 of Companies Act, 2013		
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	Yes	
6.	<p><u>Preservation of Documents:</u></p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	
7.	<p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations</p>	Yes	
8.	<p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee</p>	Yes	
9.	<p><u>Disclosure of events or information:</u></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	
10.	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	Yes	
11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder</p>	Yes	





12.	<u>Additional Non-compliances, if any:</u>  No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	
-----	---	-----	--

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

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/remarks of the Practicing Company Secretary	Management Response	Remarks
<b>Nil</b>										

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

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/remarks of the Practicing Company Secretary	Management Response	Remarks
<b>Not Applicable</b>										

Place: New Delhi  
Date: 06.05.2023

*Rakhi*

**RAKHI RANI**  
**M.NO. A31715**  
**COP-21612**  
**PEER REVIEW NO. 2398/2022**  
**UDIN:A031715E000263716**

