



BHATIA COLOUR CHEM LIMITED

CIN: L24290GJ2021PLC127878

Regd Office: Plot No.A/2/12, Road No. 1, Udhana Udyog Nagar Sangh Udhna Surat
394210

Mob No.9104294564 **Email Id:** cs@bccindia.com **Weblink:** www.bccl.info

Date: 06/05/2026

To,
BSE LIMITED
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400 001.

Scrip ID / Code / ISIN : BCCL / 543497 / INE0KQ001017
Subject : Annual Secretarial Compliance Report for the Financial Year ended March 31st, 2026
Reference No : Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/ Madam,

As per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find attached the Annual Secretarial Compliance Report of Bhatia Colour Chem Limited ("the Company") for the Financial Year ended March 31st, 2026, issued by Mr. Ranjit Binod Kejriwal, Practicing Company Secretary, Secretarial Auditor of the Company.

Request you to please take the same on your records.

Thanking you,

For Bhatia Colour Chem Limited

Renu Garg
Company Secretary & Compliance Officer
M. No.: A78150



**Secretarial compliance report of M/s Bhatia Colour Chem Limited
For the year ended March 31, 2026**

To
The Board of Directors
Bhatia Colour Chem Limited
CIN: L24290GJ2021PLC127878
Plot No. A/2/12, Road No. 1,
Udhana Udyog Nagar Sangh, Udhna
Surat-394210

Auditor's Responsibility:

My responsibility is to express an opinion on compliance of these acts, rules, regulations and circulars and maintenance of records based on my audit. I conducted my audit in accordance with the Secretarial Auditing Standards issued by the Institute of Company Secretaries of India. Those Standards require that I comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about compliance of acts, rules, regulations and circulars and maintenance of records.

I further state that due to the inherent limitations of an audit including internal, financial and operating controls, there is an unavoidable risk that some material misstatements or material non-compliances may not be detected, even though the audit is properly planned and performed in accordance with standards.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my audit opinion.

I, CS Ranjit Binod Kejriwal have examined the records of M/s Bhatia Colour Chem Limited ("the Company") which comprises:

- All the documents and records made available to us and explanation provided by the Company
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/filing, as maybe relevant, which has been relied upon to make this certification.

For the Financial year ended **March 31, 2026** ("Review Period") in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, Circulars, Guidelines issued thereunder; and
- The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, Circulars, Guidelines issued there under by the Securities and Exchange Board of India ("SEBI"):

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

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; **(Not applicable to the company during the review period);**



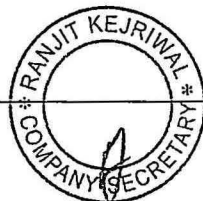
- (e) SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the company during the review period);**
- (f) SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable to the company during the review period);**
- (g) SEBI (Prohibition of Insider Trading) Regulations, 2015 and circulars/guidelines issued there under;

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

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/Remarks by PCS
1.	<p><u>Secretarial Standards:</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable</p>	Yes	
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> 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 Yes	
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> 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 documents/section of the website. 	Yes No NA	<p>It was observed that the Company had not disseminated certain documents on its website as required under applicable provisions. On being intimated by BSE Limited, the Company has since completed the uploading of such documents and has initiated measures to strengthen its compliance processes.</p> <p>The company is SME listed company; hence, Regulation 27(2) is exempted.</p>



4.	<u>Disqualification of Director:</u> None of the director of the company are disqualified under Section 164 of Companies Act 2013.	Yes	
5.	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies. (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	The Company doesn't have any Subsidiary Company.
6.	<u>Preservation of Documents:</u> 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.	Yes	
7.	<u>Performance Evaluation:</u> 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	Yes	
8.	<u>Related Party Transactions:</u> (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.	Yes NA	All related party transaction were done with prior approval of audit committee.
9.	<u>Disclosure of events or information:</u> 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 there under.	Yes	
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulation 2015.	Yes	The SDD software installed by the company was corrupted due to some technical issue. So, the company has to install a new version of SDD software. Due to lack of proper back up, the company has made entries again in new SDD software to record the same, with current time stamp.



11	<u>Actions taken by SEBI or Stock Exchange(s) if any:</u> 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 there under.	Yes	
12.	<u>Additional Non-Compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NA	There are no additional non compliances except those which are mentioned below in the table.

*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

I hereby report that, during the Review Period:

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

Sr. No.	1
Compliance Requirement (Regulations/ circular/guidelines Including specific clause	Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Regulations/ Circular No.	Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Deviations	Initial disclosure contained a typographical error, which was subsequently corrected by filing a revised outcome
Action Taken by	-
Type of Action	-
Details of Violation	The Company had submitted the outcome of the Board Meeting held on May 12, 2025; however, due to a typographical error, certain details in the disclosure were incorrect. The Company subsequently revised and re-submitted the outcome on May 13, 2025 with corrected information.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The company had erroneously mentioned the pre-preferential holding of one of the allottees, where no pre-preferential shares were held.
Management Response	The Company submits that the error in the initial disclosure was purely typographical and inadvertent in nature. Upon identification, the Company promptly revised the outcome of the Board Meeting with correct details.
Remarks	The lapse is procedural in nature and has been rectified promptly. The Company should ensure adequate verification mechanisms to avoid such errors in future disclosures.

Sr. No.	2
Compliance Requirement (Regulations/ circular/guidelines Including specific clause	Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Regulations/ Circular No.	Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Deviations	Delay in submission of shareholding pattern beyond the prescribed timeline.
Action Taken by	-
Type of Action	-
Details of Violation	The Company had allotted 15,07,199 equity shares on May 12, 2025, resulting in a change exceeding 2% of the total paid-up share capital. As per the applicable provisions, the Company was



	required to file the updated shareholding pattern within 10 days of such change. However, the same was filed on May 22, 2025, after the expiry of the prescribed timeline.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The Company has not complied with the timeline prescribed under Regulation 31(1)(c) of SEBI (LODR) Regulations, 2015 for submission of shareholding pattern.
Management Response	The Company has taken necessary steps to strengthen its compliance mechanism and ensures that such delay will not recur.
Remarks	This is a delay-based non-compliance. The Company should ensure strict adherence to prescribed timelines under SEBI (LODR) Regulations, 2015 to avoid recurrence.

Sr. No.	3
Compliance Requirement (Regulations/ circular/guidelines Including specific clause	SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/242 dated December 09, 2020
Regulations/ Circular No.	SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/242 dated December 09, 2020
Deviations	Non updation of e-voting details of Annual General Meeting (AGM) on CDSL portal
Action Taken by	-
Type of Action	-
Details of Violation	Non-updation of e-voting details of Annual General Meeting on the CDSL portal.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The Company did not update the e-voting details pertaining to its Annual General Meeting on the CDSL portal as required under the applicable e-voting framework.
Management Response	The Company has taken necessary steps to strengthen its compliance mechanism and ensures that such instance will not recur.
Remarks	This is a procedural non-compliance. The Company should ensure strict adherence to e-voting requirements and proper coordination with the e-voting service provider to avoid recurrence.

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

Sr. No.	1
Compliance Requirement (Regulations/ circular/guidelines Including specific clause	Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Regulations/ Circular No.	Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Deviations	Submission of Revised Annual Report for Financial Year 2023-24.
Action Taken by	-
Type of Action	-
Details of Violation	Due to typographical error, the Company has filed the Revised Annual Report for Financial Year 2023-24.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	Certain inadvertent typographical error was noticed in the Annual Report of the Company for Financial Year 2023-24. Therefore, the Company has filed the Revised Annual Report for the Financial year 2023-24 on August 21, 2024.
Observations made in the secretarial compliance report for the year ended.(the years are to be mentioned)	For the year ended March 31, 2025.
Comments of the practicing company secretary on the actions taken by the listed entity.	The company has rectified the error in the revised filing of Annual Report.



Remedial actions, if any, taken by the listed entity	Rectification of error by revised filing.
Management Response	Upon notice, the company rectified the inadvertent error and filed Revised Annual Report for Financial Year 2023-24 on August 21, 2024.
Remarks	-

(c) During the year under review no appointment/ re-appointment/ resignation of statutory auditor of the company has occurred. The company has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	As there is no resignation of Auditor, these clauses are not applicable
	ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	NA	
	iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	
2.	Other conditions relating to resignation of statutory auditor		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:		
	a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.	NA	There is no subsidiary company.
	b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the	NA	There is no subsidiary company.




	<p>proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of Information</p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>	<p>NA</p> <p>NA</p>	<p>None</p> <p>None</p>
3.	<p>The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.</p>	<p>NA</p>	<p>None</p>

We further report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. - **Not Applicable**

Place: Surat
Date: 05/05/2026



Signature: 
Name of PCS: Ranjit Binod Kejriwal
FCS No.: 6116
C P No.: 5985
UDIN: F0061164000279873
PR: I2004GJ424500

This report is to be read with our letter dated May 05, 2026 which is annexed and forms an integral part of this report.

To
The Board of Directors
Bhatia Colour Chem Limited
CIN: L24290GJ2021PLC127878
Plot No. A/2/12, Road No. 1,
Udhana Udyog Nagar Sangh, Udhna
Surat-394210

Our report dated May 05, 2026 is to be read along with this letter:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Surat
Date: 05/05/2026



Signature:

Name of PCS: Ranjit Binod Kejriwal

FCS No.: 6116

C P No.: 5985

UDIN: F006116H000279873

PR: I2004GJ424500