BHARAT GLOBAL DEVELOPERS LTD.
(Formerly Known as Kkrrafton Developers ltd)

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Date: 10-06-2025

To
Department of Corporate Services
The Bombay Stock Exchange Ltd. P.J. Towers,
Dalal Street, Fort, Bombay- 400 001

Subject: Submission of Annual Secretarial Compliance Report for the period ended 31.03.2025 as per Regulation 24(A) of SEBI (LODR) Regulations, 2015.

Ref.: BSE Script code: - 521238

In compliance to Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are herewith enclosing the Annual Secretarial Compliance Report pertaining to the financial year ended 31st March 2025 issued by Mr. Himanshu Togadiya Practicing Company Secretary and Proprietor of M/s. H. Togadiya & Associates Secretarial Auditor of the Company.

Please take the aforesaid on record.

Thanking You,
Yours faithfully,

FOR BHARAT GLOBAL DEVELOPERS LTD.,
(Formerly Known as Kkrrafton Developers Ltd)

Patel Keyurkumar
Digitally signed by Patel Keyurkumar
Date: 2025.06.10 17:11:08 +05'30'

EXECUTIVE DIRECTOR
KEYURKUMAR PRAVINBHAI PATEL
DIN: 10822762
Encl: A/a

(+91)79-49229525
G block , Uniza Corporate Office, Premchand Nagar Rd, opp. Krishna Complex, Satellite, Ahmedabad, Gujarat 380015
inquiry@bgdl.co.in
www.bgdl.co.in

SECRETARIAL COMPLIANCE REPORT OF

BHARAT GLOBAL DEVELOPERS LIMITED

FOR THE YEAR ENDED MARCH 31, 2025

We, **H Togadiya & Associates**, Practicing Company Secretary, Rajkot have examined:

(a) all the documents and records made available to us and explanation provided by **BHARAT GLOBAL DEVELOPERS LIMITED** ("the listed entity"),
(b) the filings/ submissions made by the listed entity to the stock exchanges,
(c) website of the listed entity,
(d) any other document/ filing, as may be relevant,

which has been relied upon to make this certification, for the year ended **March 31, 2025** ("Review Period") in respect of compliance with the provisions of : -

(i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
(ii) 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 and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
1. Company has increased its Authorized capital from 100 Crore to 200 Crore by passing Ordinary resolution in its EGM held on 01st August, 2024.
2. Company has allotted 35,00,000 Equity share by way of Private Placement to Non Promoter Group on 19th August, 2024.
3. Company has sub-divided face value of its shares from Rs. 10 to Rs. 1 by passing Special Resolution in its EGM held on 12th December, 2024.
4. Company has changed its name From M/S. Kkrrafton Developers Limited To M/S. Bharat Global Developers Limited its EGM held on 01st August, 2024.

(b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
1. *The Exchange has received the disclosure under Regulation 29(1) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 from Dhaval Manubhai Jadhav, Hiren Maheshbhai Sadhu, Nishitaben Chandrakant Bharvad, Manubhai Sendhabhai Bharwad, Jayeshbhai Kanjibhai Parmar, Arjun Kishorebhai Bhut, Neel Kamleshbhai Sanandiya and Kevinkumar Mansukhlal Saparia.*

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90161 18515 office.htogadiya@gmail.com

(c) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable during the review period**

(d) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable during the review period**

(e) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable during the review period**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable during the review period**

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

(h) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

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

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

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1	**Secretarial Standards:** The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	Yes	***Some Minutes and attendance sheets of Board meetings and EGM was not properly maintained.***
2	**Adoption and timely updation of the Policies:** • 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 have been	Yes Yes	- -

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	reviewed & updated on time, as per the regulations /circulars/guidelines issued by SEBI		
3	**Maintenance and disclosures on Website:** • 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	-
	Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	-
5	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes	- -
6	**Preservation of Documents:** 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	Yes	-

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	under SEBI LODR Regulations, 2015.		
7	**Performance Evaluation:** The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	-
8	**Related Party Transactions:** (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes NA	All RPT Taken Prior Approval -
9	**Disclosure of events or information:** 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.	Yes	-
10	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11	**Actions taken by SEBI or Stock Exchange(s), if any:** No action(s) has been taken against the listed entity/ its promoters/ directors/	Yes	***SEBI has issued interim order against the company Under Sections 11(1), 11(4) and 11B(1) of the Securities and Exchange Board of India Act, 1992 on 23rd***

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	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 except as provided under Separate paragraph herein.		***December, 2024. Order No. WTM/AB/CFID/CFID-TPD/31067/2024-25 SEBI has also suspended Company from Trading on Stoke Exchange*** ***Further SEBI has Issued CONFIRMATORY ORDER Under Sections 11(1), 11(4) and 11B(1) of the Securities and Exchange Board of India Act, 1992 on 26th March, 2025*** ***Order No. WTM/AB/CFID/CFID-TPD/31324/2024-25*** ***SEBI has revoked Suspension of Company in its Confirmatory order issued on 26th march 2025***
12.	**Resignation of Statutory Auditor from the listed entity or its material subsidiaries:** In case of resignation of statutory audiot or from the listed entity or any of its material subsidiaries during the financial year, the listed entity and/or its material subsidiaries has/have complied with paragraph 6.1 and 6.2 of section V-D of the Chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	Yes	-
13.	**Additional Non-compliances, if any:** Additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	YES	• ***Audit report of the company should be signed by CFO & CS of the company.*** • ***Composition of Board of Directors is not as per SEBI Regulation.*** • ***Company has not Appointed Company secretary and Compliance officer.***

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			• ***Company has not Appointed CFO.*** • ***Company has not Filed form PAS-3 for Allotment of Bonus shares with ROC.*** • ***Due to SEBI Interim Order Board of Directors was changed and new management was appointed. However, Final order of SEBI is awaiting and investigation by SEBI is going on.***

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The Additional disclosures of Annual Secretarial Compliance Report as below:-

(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.	Com- pliance Require- ment (Regu- lations/ circulars/ guide- lines including specific clause)	Regu - latio n/ Circu lar No.	De via tio ns	Acti on Tak en by	Type of Actio n	Detail s of Violat ion	Fin e Amo unt	Obser- vations/ Remarks of the Practicin g Compan y Secretar y	Man - age- men t Re- spo nse	rem ark
1	***Audit report of the company should be signed by CFO & CS of the company.***	Regul ation 33	-	-	-	-	-	***Audit report of the company should be signed by CFO & CS of the company.***	-	-
2	***Composition of Board of Directors is not as per SEBI Regulation.***	Regul ation 17	-	-	-	-	-	***Compositio n of Board of Directors is not as per SEBI Regulation***	-	-
3	***Company has not Appointed Company secretary and Compliance officer.***	Secti on 203(5) of the Comp anies Act	-	-	-	-	-	***Company has not Appointed Company secretary and Complianc e officer***	-	-
4	***Company has not Filed form PAS-3 for***	Secti on 42 of CA	-	-	-	-	-	***Company has not Filed form***	-	-

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	Allotment of Bonus shares with ROC.	act, 2013						***PAS-3 for Allotment of Bonus shares with ROC.***		

(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	Action Taken By	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
NOT APPLICABLE.										

Assumptions & limitations of scope and review:

1. Compliance of applicable laws and ensuring the authenticity of documents and information furnished, are those responsibilities of the management of the Company.

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 term of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither and 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.

FOR, H TOGADIYA AND ASSOCIATES,
Practicing Company Secretary



CS Himanshu Togadiya
Proprietor
COP No.: 18233 FCS: 11822

UDIN: F011822G000566728

Date: 09/06/2025
Place: Rajkot

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