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

**CIN**: L70100GJ1992PLC017815
**GST**: 24AAACP9354K1Z5

**Date: 28-05-2026**

**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 31.03.2026 as per Regulation 24(A) of SEBI (LODR) Regulations, 2015:**

**Ref.: BSE Script code: - 521238**

Dear Sir/ Madam,

In compliance to Regulation 24A 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 2026 issued by M/s H Togadiya and Associates, Practicing Company Secretary (COP: 18233).

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: 2026.05.28 14:45:55 +05'30'

**MANAGING DIRECTOR**
**KEYURKUMAR PRAVINBHAI PATEL**
**DIN: 10822762**
**Encl: A/a**

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H TOGADIYA & ASSOCIATES
PRACTICING COMPANY SECRETARY

**SECRETARIAL COMPLIANCE REPORT OF**

# BHARAT GLOBAL DEVELOPERS LIMITED

**(CIN: L70100GJ1992PLC017815)**

**FOR THE YEAR ENDED MARCH 31, 2026**

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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, 2026** ("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; (**Applicable** to the Company)

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (**Applicable** to the Company);

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (**Applicable** to the Company);

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

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

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



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

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (**Applicable** to the Company)

(i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993; (**Applicable** to the Company)

(j) Securities and Exchange Board of India (Depository Participant) Regulations, 2018; (**Applicable** to the Company)

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

| Sr. No. | Particulars | Compliance Status (Yes/No/ NA) | Observations /Remarks by PCS* |
|---|---|---|---|
| 1 | **Secretarial Standards:**<br><br>The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3 | Yes | ***Not Any*** |
| 2 | **Adoption and timely updation of the Policies:**<br><br>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities<br>• All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations /circulars/guidelines issued by SEBI | Yes | ***Not Any*** |
| 3 | **Maintenance and disclosures on Website:**<br><br>• The Listed entity is maintaining a functional | Yes | ***Not Any*** |



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| | website<br>• Timely dissemination of the documents/ information under a separate section on the website<br>• 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 | | |
| 4 | **Disqualification of Director:**<br><br>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 | ***Not Any*** |
| 5 | **Details related to Subsidiaries of listed entities have been examined w.r.t.:**<br><br>(a) Identification of material subsidiary companies<br>(b) Disclosure requirement of material as well as other subsidiaries | NA | ***There is no subsidiary of the company*** |
| 6 | **Preservation of Documents:**<br>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of<br>records as per Policy of Preservation of Documents<br>and Archival policy prescribed under SEBI LODR Regulations, 2015. | Yes | ***Not Any*** |
| 7 | **Performance Evaluation:**<br><br>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 | Yes | ***Not Any*** |



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| | Regulations. | | |
| 8 | **Related Party Transactions:**<br><br>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or<br>(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 | ***Not Any*** |
| 9 | **Disclosure of events or information:**<br><br>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 | 1. ***Delay in furnishing prior intimation about the meeting of the Board of Directors. (February, 2026);***<br><br>***2. Delay in Submission of Annual Report March, 2025 with Exchange.***<br><br>***3. Late Submission of Financial Results for September, 2025.*** |
| 10 | **Prohibition of Insider Trading:**<br><br>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015. | Yes | ***Not Any*** |
| 11 | **Actions taken by SEBI or Stock Exchange(s), if any:**<br><br>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard | 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 December, 2024.***<br>***Order No. WTM/AB/CFID/CFID-TPD/31067/2024-25*** |



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| | Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines issued thereunder except as provided under Separate paragraph herein. | | ***SEBI has also suspended Company from Trading on Stoke Exchange***<br><br>***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***<br><br>***Order No. WTM/AB/CFID/CFID-TPD/31324/2024-25***<br><br>***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:**<br><br>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 | ***KM CHAUHAN AND ASSOCIATES, Statutory Auditor of the Company has been resigned from the post of auditor on 04/07/2025 Due to Due to pre-occupation in other assignments.(ADT-3 filed with SRN-AB5415360)*** |
| 13. | **Additional Non-compliances, if any:**<br>Additional non-compliance observed for any SEBI regulation/circular/guidance note etc. | YES | • ***Company has not Appointed Company secretary and Compliance officer.***<br><br>• ***Company has not Filed form ADT-1 for Appointment of Statutory Auditor for Casual vacancy arise due to resignation of KM Chauhan & Associates.***<br><br>• ***Company has Not Filed form DIR-12 for Regularization of Director Mr. Ketan Chavda.*** |



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| | | | • ***Final order of SEBI is awaiting and investigation by SEBI is going on.*** |

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 | ***Regulation 29(2)/29(3) – Delay in furnishing prior intimation about the meeting of BOD*** | *Regul ation 29(2) /29(3 )* | - | BSE | Fine | - | 11800 | ***Company has not yet paid fine.*** | - | - |
| 2 | ***Regulation 34 – Delay in furnishing Annual Report- March 2025*** | Regul ation 34 | - | BSE | Fine | - | 2360 | ***Company has not yet paid fine.*** | - | - |
| 3 | ***Regulation 33 – Delay in furnishing Financial Results- September 2025*** | Regul ation 33 | - | BSE | Fine | - | 23600 | ***Company has not yet paid fine.*** | - | - |
| 4 | ***Regulation 6(1)- Non-Compliance*** | Regul ation 6(1) | - | BSE | Fine | - | 24780 | ***Company has not yet paid fine.*** | - | - |



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| | ***with requirement to appoint a qualified Company Secretary as the Compliance officer*** | | | | | | | | | |

(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 |
|---|---|---|---|---|---|---|---|---|---|---|
| 1 | Audit report of the company should be signed by CFO & CS of the company. | Regulation 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. | Regulation 17 | - | - | - | - | - | Company has Appointed Board of Directors as per requirement, However, Company Secretary is Not appointed. | | - |
| 3 | Company has not Appointed Company secretary and Compliance officer. | Regulation 6(1) | - | - | - | - | - | Company has not Appointed Company secretary and Compliance officer. | | - |
| 4 | Company has not Filed form PAS-3 for Allotment of | Section 42 of CA 2013 | - | - | - | - | - | Complied | | - |



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| | **Bonus shares with ROC** | | | | | | | | | |

**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: F011822H000425510

Date: 21/05/2026
Place: Rajkot



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