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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

14.02.2025

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

Sub: Disclosure of Adjournment of Board Meeting Due to Lack of Quorum

Ref.: BSE Script code: - 521238

With reference to the captioned subject, we hereby inform you that the meeting of board of directors of the company scheduled to be held on 14.02.2025 at 06:00 P.M. through Video Conferencing mode to transact the following businesses:

1. To consider and approve Unaudited Financial Results of the Company for the Quarter ended 31st December, 2024.
2. Any other business with the permission of the chair which is incidental and ancillary to the business.

In accordance with the provisions of Regulation 29 and all other applicable provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we would like to inform you that the Meeting of Board of Directors of the Company is adjourned due to lack of quorum.
The Board Meeting will be held on Tuesday, February 18th, 2025 for consideration and approval of the business submitted vide intimation dated 10th February, 2025.
Please kindly take into your records.

Thanking You,

Yours faithfully,

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

Patel Keyurkumar
Digitally signed by Patel Keyurkumar
Date: 2025.02.14 18:36:05 +05'30'

INDEPENDENT DIRECTOR
KEYURKUMAR PRAVINBHAI PATEL
DIN: 10822762

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

14.02.2025

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

Sub: Outcome of Board Meeting of the Company held on 14th February, 2025 and Submission of Standalone and Consolidated Un-Audited Financial results for the Quarter and Nine months ended on 31st December, 2024

Ref.: BSE Script code: - 521238

Dear Sir,

Pursuant to the provisions of Regulation 30 read with Regulations 33 and 52 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations") kindly find enclosed herewith the Un-Audited Financial Results alongwith Limited Review Report for the Quarter and Nine months ended on 31st December, 2024 which is approved by the Board of Directors in its meeting held on 14th February, 2025.

Kindly note that the meeting commenced at 02.00 P.M. on 14th February, 2025 and concluded at 02:30 P.M. on 14th February, 2025.

Please kindly take into your records.

Thanking You,

Yours faithfully,

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

INDEPENDENT DIRECTOR
KEYURKUMAR PRAVINBHAI PATEL
DIN: 10822762

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

15.02.2025

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

Sub: Newspaper Advertisement- Un-Audited Standalone Financial Results for the Quarter and Nine months ended on 31st December, 2024
Ref.: BSE Script code: - 521238

Dear Sir,

With reference to the captioned subject, we would like to inform you that in accordance with Regulation 47 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company has published its Un-audited Financial Results for the Quarter and Nine months ended on 31st December, 2024 in all editions of FINANCIAL EXPRESS (English) and (Gujarati) Newspapers on 15th February, 2025.

Please kindly take into your records.

Thanking You,

Yours faithfully,

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

INDEPENDENT DIRECTOR
KEYURKUMAR PRAVINBHAI PATEL
DIN: 10822762

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

10.02.2025

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

Sub.: INTIMATION OF BOARD MEETING PURSUANT TO REGULATION 29 OF SEBI (LODR) REGULATIONS 2015

Ref.: BSE Script code: - 521238

With reference to the captioned subject, we hereby inform you that a meeting of the Board of Directors of the Company is scheduled to be held on 14th Day of February, 2025 via Video Conferencing to transact the following businesses:

1. To consider and approve Unaudited Financial Results of the Company for the Quarter ended 31st December, 2024.

2. Any other business with the permission of the chair which is incidental and ancillary to the business.

Pursuant to Company's Code of Conduct to Regulate, Monitor & Trading by Insider as per SEBI (Prohibition of Insider Trading) Regulations", 2015 trading Window shall remain closed up to February 16, 2025 i.e., 48 hours after the announcement of the Unaudited Standalone Financial Results for the 3rd Quarter ended on 31st December, 2024.;

Please kindly take into your records.

Thanking You,

Yours faithfully,
For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

INDEPENDENT DIRECTOR
KEYURKUMAR PRAVINBHAI PATEL
DIN: 10822762

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

24.01.2025

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

Sub: Submission of Reconciliation of Share Capital Audit Report under Regulation 76(1) of the SEBI (Depositories & Participants) Regulations, 2018

Ref.: Company Code No. 521238

Dear Sir/Madam,

Pursuant to Regulation 76(1) of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, we are hereby submitting the Reconciliation of Share Capital Audit Report for the quarter ended 31st December 2024 duly certified by a Practicing Company Secretary.

Please take into your records.

Thanking You,

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

20.01.2025

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

Subject: Announcement regarding Interim Order issued by SEBI

Ref.: Company Code No. 521238

Dear Sir/Madam,

This is to inform the stakeholders of Bharat Global Developers limited that the Securities and Exchange Board of India (SEBI) has issued an interim order in connection with certain matters concerning the company. We would like to clarify that the company is fully committed to ensuring compliance with all regulatory requirements and corporate governance standards.

In light of this interim order, we would like to assure the investors and the public that the company is is taking all necessary steps to resolve the matter as quickly and efficiently as possible.
Further, We would like to inform that the company continues to comply with all routine regulatory and statutory compliances as required under the applicable laws and regulations.

We kindly request the continued support and trust of our investors as we work towards resolving this issue promptly.

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

BHARAT GLOBAL DEVELOPERS LTD.
(Formerly Known as Kkrrafton Developers ltd)
CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

09.01.2025

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

Subject: Certificate pursuant to Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018 for the quarter ended 31st December, 2024

Ref.: Company Code No. 521238

Dear Sir/Madam,

Pursuant to Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018, we enclose herewith a copy of the certificate received from "Purva sharegistry (I) Pvt. Ltd. the Registrar and Share Transfer Agent of the Company for quarter ended December 31st , 2024. We request you to take the same on record.

Kindly acknowledge the receipt and oblige.

Thanking You,

Yours faithfully,

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Date: 03-01-2025

To
The Securities and Exchange Board of India (SEBI)
SEBI Bhavan - II,
BKC, Mumbai

Subject: Submission of Comprehensive Reply to SEBI Communication

Dear Sir/Madam,

We refer to the communication received from your esteemed office regarding the ongoing investigation into the affairs of Bharat Global Developers Limited (BGDL). As directed, we are pleased to submit a comprehensive reply addressing the requirements outlined in the order, particularly paragraph 70.

Our submission includes detailed information and documentation concerning the following:
Commercial transactions and associated records, including Income Tax returns, minutes of the Board of Directors and Audit Committee meetings for FY 2023-24 and FY 2024-25.
GST registration, payments, and returns for FY 2023-24 and FY 2024-25.
Communications and ledgers related to business contracts with TATA Agro & Consumer Products, Reliance Industries Ltd., UPL Agro Pvt. Ltd., and McCain India Agro Pvt. Ltd.
Details of funds raised through preferential allotments during FY 2023-24 and FY 2024-25, as per the prescribed format.
Information on all bank accounts held by BGDL, including overdraft accounts, statements, and authorized signatories.
Comprehensive details of the top 20 debtors, creditors, customers, and suppliers for FY 2023-24 and FY 2024-25.
Breakups of Other Current and Non-Current Assets, liabilities, inventory valuation, and investments.
Employee Benefit Expenses and Loans and Advances details in the requested formats.
We have endeavored to provide all requested data accurately and comprehensively. Should there be any further clarifications or additional information required, we remain available to provide the same promptly.

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

We trust the enclosed information will aid in your assessment and stand ready to assist in ensuring compliance with the regulatory framework.

Thank you for your attention and guidance in this matter.

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Annexure II

Date: 20-12-2024

To,
General Manager,
Department of Corporate Services,
BSE Limited,
P.J. Towers, Dalal Street,
Mumbai – 400 001.

Dear Sir,

Sub: Application for listing of 81,00,76,800 bonus equity shares issued in terms of Chapter XI of SEBI (ICDR) Regulations, 2018

In connection with above application for in-principle approval, we hereby confirm and certify that:

a) the company has complied with all the provisions of Chapter XI of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018.

b) the company has complied with all the legal and statutory formalities for allotment of aforesaid equity shares and no statutory authority has restrained the company form issuing bonus shares.

c) the documents filed by the company with the Exchange are same/ identical in all respect which have been filed by the company with Registrar of Companies/ SEBI/ Reserve Bank of India/ FIPB in respect of the allotment of these bonus shares as well as enlistment of the aforesaid on the Exchange

d) the shares issued to NRIs are as per guidelines issued by Reserve Bank of India.

e) the company or its promoters or whole-time directors are not in violation of the provisions of Regulation 34 of the SEBI Delisting Regulations, 2021.

f) "We hereby confirm that the company, its promoters, its directors are not in violation of the restrictions imposed by SEBI under SEBI circular no. SEBI/HO/ MRD/DSA/CIR/P/2017/92 dated August 01, 2017."

g) We hereby confirm that any of the promoters or directors is not a fugitive economic offender.

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Date: 20-12-2024

To,
Purva Sharegistry India Pvt. Ltd.
Unit no. 9 Shiv Shakti
Ind. Estt J .R. Boricha marg
Lower Parel (E) Mumbai 400 011

Subject: PARI PASSU CERTIFICATE

Dear Sir/Ma'am,

We hereby confirm and undertake that:-

The new Equity shares of Re. 1/- Each upon sub-division to the respective allottees shall in all respects rank pari-passu with the existing fully paid-up equity shares of the Company.

Kindly take the same in your record.

Thanking You,
For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Date: 20-12-2024

To,
Purva Sharegistry India Pvt. Ltd.
Unit no. 9 Shiv Shakti
Ind. Estt J .R. Boricha marg
Lower Parel (E) Mumbai 400 011

Subject: PARI PASSU CERTIFICATE

Dear Sir/Ma'am,

We hereby confirm and undertake that:-

The new Equity shares of Re. 1/- Each upon sub-division to the respective allottees shall in all respects rank pari-passu with the existing fully paid-up equity shares of the Company.

Kindly take the same in your record.

Thanking You,
For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

BHARAT GLOBAL DEVELOPERS LTD.

(Formerly Known as Kkrrafton Developers ltd)

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

CERTIFIED TRUE COPY OF THE RESOLUTION PASSED IN THE MEETING OF BOARD OF BHARAT GLOBAL DEVELOPERS LIMITED (FORMERLY KNOWN AS KKRRAFTON DEVELOPERS LIMITED AT THEIR MEETING HELD ON 18th DAY OF NOVEMBER 2024 AT THE REGISTERED OFFICE OF THE COMPANY AT 10:00 A.M.

"**RESOLVED THAT** in supercession of all the resolutions passed hereinbefore, the Current Bank Account bearing No. 1051102100000755 maintained with Punjab national bank, C.G. Road Branch, Ahmedabad be operated under the name & style **"BHARAT GLOBAL DEVELOPERS LIMITED" instead of 'KKRRAFTON DEVELOPERS LIMITED'** with immediate effect, as per the Change of Name Certificate issued by the Registrar of Companies, Ahmedabad."

"**Resolved Further that** the Company M/s BHARAT GLOBAL DEVELOPERS LIMITED has changed their Address from **A 707, Sun West Bank, Ashram Road, Ahmedabad,380009- Gujarat (India)** To **G Block, Uniza Corporate Office, Premchand Nagar Road, Opposite Krishna Complex, Satellite, Ahmedabad, Gujarat, 380015.**

"RESOLVED FURTHER THAT any one of the Directors of the Company, be and is hereby authorized to undertake all such steps, deeds, actions as may be deemed expedient by them to give effect to this resolution for and on behalf of the Board of Directors of the Company"

"RESOLVED FURTHER THAT a certified copy of the forgoing resolution be furnished to the said Bank and the said Bank is requested to act upon it."

Certified True Copy

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Kindly provide the below mentioned details for ISIN Activation.
Equity Shares :1012596000
Kindly indicate (Yes/No) against relevant Row(s)

1)Voting right details :

i) Each share has one vote- Yes

ii) Share has no voting right-No

iii) The shareholder may be entitled to less than one vote per share*-No

iv) The shareholder is entitled to more than one vote per share*-No

*Please provide the voting right details in a separate sheet

2)Payment Status
i) Nil Paid Up-YES
ii) Partly Paid Up--No
iii) Fully Paid Up-No

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Date:18.12.2024

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

Dear Sir,

Sub.: Clarification regarding correction in face value of shares mentioned in the Record Intimation

Ref.: BSE Script code: - 521238

This is to inform you that there has been a discrepancy in the communication in the record date intimation which was submitted to BSE on 12th December, 2024.

The intimation erroneously mentioned the face value of the company's shares as Rs.10/-. However, we would like to clarify that the correct face value of the shares is Re. 1/- for the purpose of Bonus Issue.

We request you to kindly update your records to reflect this correction. We apologize for any confusion caused by this oversight and appreciate your understanding.

This is for information and records.

Thanking You,
Yours faithfully,

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Date:18.12.2024

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

Dear Sir,

Sub.: Disclosure under Regulation 42 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 - 'Record Date' for the purpose of Bonus Issue and Sub-Division of Shares

Ref.: BSE Script code: - 521238

In terms of Regulation 42 of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015, as amended, the Board of Directors in its meeting held on Thursday, December, 12, 2024 have fixed a Record date for the purposes of ascertaining the eligibility of shareholders entitled for issue of Bonus Shares and sub-division of Shares by the Company as mentioned below:

Type of Security	Record Date	Purpose
Equity Shares	Thursday, December 26, 2024	Sub-division of One (1) Equity Share of face value of Rs. 10/- (Rupees Ten only) each into Ten (10) equity shares of face value of Re.1/- (Rupee One only) each
	Thursday, December 26, 2024	Issue of Bonus share in the ratio of 08:10 i.e. Eight (8) new bonus Equity Share of Re.1/- each for every Ten (10) existing fully paid up Equity Shares of Re.1/- each, held.

This is for information and records.
Thanking You,
Yours faithfully,
For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

Name	Pan	Designation
MAHADEV MANUBHAI MAKWANA	EXFPM7561C	AUTHORISED SIGNATORY

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

Name	Pan	Designation	Shareholding
RAKESH RAJKUMAR DUTTA	ACCPD6588J	Independent Director	Nil
ASHOK KUMAR SEWDA	BQAPS9919R	Managing Director	Nil
DINESH KUMAR BIHARILAL SHARMA	CLDPS4790M	Executive Director	Nil
NIRALI PRABHATBHAI KARETHA	EAPPK9315D	Non-Executive Director	Nil
KEYUR PRAVINBHAI PATEL	CFXPP5105B	Independent Director	Nil

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

18-12-2024

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

Sub: Undertaking

Dear Sir/Madam,

With reference to SEBI Circular no. SEBI CIR/CFD/PoD/2024/122 dated September 16, 2024, we hereby undertake that we shall submit the required documents for credit of bonus shares with the depository system latest by 12 P.M. on Friday, December 27, 2024 i.e next working day of the record date i.e. Thursday, December 26, 2024 (i.e. T+1 day), and also ensure that the same will be available for trading on BOD (Beginning of the day) of T+2 day (i.e. December 30, 2024).

We hereby provide the details of Bonus issue:

No. of Bonus shares	810076800 equity shares of Re. 1/- each
Distinctive No.	1012596001-1822672800
Deemed date of allotment	27/12/2024 i.e. 1 Working day from Record date
Effective Listing date	30/12/2024 i.e. 2 working days from the Record date ("T")
Current ISIN	INE893C01032

Thanking you
For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

16-12-2024

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

Subject: Clarification and Correction Regarding Reliance Industries Order Value

Dear Sir/Madam,

Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we wish to clarify an inadvertent error in our earlier announcement regarding the value of the order secured from Reliance Industries Ltd.

The correct value of the Fluidized Catalytic Cracker (FCC) project order is ₹120 Crores, not ₹300 Crores as mistakenly mentioned in our previous communication. The error occurred due to a human oversight, and we deeply regret any confusion caused by this discrepancy.

We would like to reiterate that the ₹120 Crore FCC project order was successfully completed and reflects the company's unwavering commitment to delivering high-value projects with precision and adherence to timelines. This project stands as a testament to our operational excellence and strengthens our relationship with Reliance Industries Ltd., one of India's most esteemed conglomerates.

We assure our stakeholders that the company remains focused on its growth trajectory, with a strong order book exceeding ₹1,500 Crores, which includes significant contracts from Reliance Industries, Tata Agro, McCain India, and international orders via our Dubai-based subsidiary.

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

The management of Bharat Global Developers Ltd. remains committed to transparency, accuracy, and compliance with all regulatory requirements.

We sincerely apologize for this inadvertent error and appreciate your understanding.

Thank you for your continued trust and support.

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

Disclaimer: This clarification is issued in compliance with SEBI (LODR) Regulations, 2015, and serves to correct the previously communicated information.

(+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

ARCHIVAL POLICY FOR ANY MATERIAL EVENT / INFORMATION DISCLOSED TO THE STOCK EXCHANGES

I. PREFACE

The Board of Directors (the "Board") of Bharat Global Developers Limited (the "Company") has adopted the following Archival Policy with regard to any material events or information which were disclosed to the Stock Exchanges in terms of the Company's Code for Fair Disclosures of any material event and information.

II. PURPOSE

This Policy is framed pursuant to Regulation 30 (8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 (Listing Regulations). The purpose of this Policy is to archive any of the material events or information which were disclosed by the Company to the Stock Exchanges prior to the period of five years in terms of Regulation 30 of the Listing Regulations.

III. POLICY

Any disclosure of events or information which have been submitted by the Company to the Stock Exchange(s) under Regulation 30 of the Listing Regulations and Policy of the Company (Disclosed Information) will be available on the website of the Company for a period of five years from the date of its disclosure. Disclosed Information which was over five years old will be archived from the website of the Company.

IV. COMMUNICATION OF THIS POLICY

A copy of this Policy shall be posted on the web-site of the Company.

V. AMENDMENT

The Board or Management Committee so authorised for the purpose shall have the powers to review or amend any of the provisions of this Policy, substitute any of the provisions with a new provisions or replace this Policy entirely with a new Policy.

REGULATION 46 -SEBI LODR (DISCLOSURES)

BHARAT GLOBAL DEVELOPERS, a public limited company incorporated in June 15th 1992 in Ahmedabad is a pioneering enterprise dedicated to facilitating global trade across diverse business sectors. With a keen focus on efficiency, reliability, and innovation, we specialize in sourcing, importing, and exporting a wide array of products spanning industries such as Textile, Agriculture, Construction material, Bullion, Gemstones and beyond. Our extensive network of partners and suppliers enables us to deliver high-quality goods while ensuring competitive pricing and timely delivery. At BHARAT GLOBAL DEVELOPERS, we pride ourselves on our commitment to excellence in every aspect of our operations, from procurement to distribution, forging lasting partnerships built on trust and mutual success.

REGULATION 46 -SEBI LODR (DISCLOSURES)

1. Business Details

The company was incorporated as a Private Limited Company on 15th June, 1992 with Registrar of Companies, Gujarat at Ahmedabad and was converted into Perfect Weavers Limited, a public limited Company on 8th September, 1993. The Company has an existing unit at Kalol, Gujarat, engaged in the manufacture & export of 100% cotton fabrics made from dyed & grey yarn. The unit started commercial production from September, 1992.

Initially, to establish itself in the market, the company was doing job work (weaving) for M/s Bharat Vijay Mills Limited, a well known established Textile Mill in Ahmedabad, However, the Company has not entered into any agreement with Bharat Vijay Mills Ltd. for doing the job
work. The margin of profit was low and at the same time it could not utilise its optimum capacity. However, in 1993-94 the Company improved its capacity utilisation and also started exporting part of its fabrics through merchant exporters, after getting it processed at Bharat Vijay Mills Limited, where realisations were better. Encouraged by the response to the quality of their fabrics, the Company decided to expand its weaving capacity from 11.40 lac
meters per annum to 39.89 lac meters per annum by installing machineries for Weaving & Yarn Dyeing facility.

2003

- had signed an agreement with A. P. based company for B.P.O. work.

2011

- Sequel e-Routers Ltd has approval for change of Registered office of the company from 302, Mahakant Complex, Near V S Hospital Ellisbridge, Ahmedabad-380006 to 1, Ashiyana Bunglow, opp Judges Bunglow, Bodakdev, Ahmedabad 380015.

2012

- Sequel e-Routers Ltd has change the registered office of the Company from 1, Ashiyana Bunglow, Opp. Judges Bunglow, Bodakdev, Ahmedabad - 380015 to 1, Ankur Complex, 2nd Floor, B/h, Town Hall, Opp. Hasubhai Chambers, Ellisbridge, Ahmedabad - 380 006.

2014

Sequel e-Routers Ltd has been fixed as a Record Date for the purpose of consolidation of equity shares of the Company from Rs. 1/- each into Rs. 10/- each.

-Sequel e-Routers has Consolidates its Face value from Rs 1/- to 10/-

2017
- Change of name of the Company from Sequel-e- Routers limited to Kkrrafton Developers ltd

To enter business objectives of the company

CODE OF CONDUCT FOR BOARD OF DIRECTORS AND SENIOR MANAGEMENT

Bharat Global Developers Limited's Corporate Governance philosophy aims to achieve the highest levels of accountability, openness, and equity in all aspects of its operations and interactions with stakeholders.

Bharat Global Developers Limited is devoted to creating and adhering to the highest corporate governance standards in order to achieve profitable growth and increase shareholder value.

1. Introduction:

This Code of Conduct (Code) has been framed under the Regulation 17 (5) (a) of the SEBI(Listing Obligation and Disclosure Requirements) Regulation, 2015 with the Stock Exchange as amended by the Securities Exchange Board of India and .
The Code has come into effect from the date of its adoption by the Board of Directors at their duly convened and constituted meeting.

2. Definitions & Interpretation:

In this Code, unless repugnant to the meaning or context thereof, the following expressions shall have the meaning given to them below:

1. "**Board Members**" shall mean the Directors on the Board of Directors of the Company.

2. "**Whole-time Directors**" shall mean the Board Members who are in whole-time employment of the Company.

3. "**Part time Directors**" shall mean the Board Members who are not in whole time employment of the Company.

4. "**Relative**" shall mean 'relative' as defined in Clause 77 of Section 2 and read with Rule 4 of Chapter I Companies (Specification of Definitions Details) Rules, 2014 of the Companies Act, 2013.

5. "**Senior Management Personnel**" shall mean personnel of the Company who are members of its core management team excluding Board of Directors and would comprise of all members of management one level below the executive directors, including viz. Company Secretary, Manager, CEO, CFO, all Functional Heads, all Unit Heads, Presidents, Joint Presidents and all other executives having similar or equivalent rank in the Company

6. "**The Company**" shall mean **BHARAT GLOBAL DEVELOPERS LIMITED**.

3. **Applicability**:

The Code applies to the following personnel:

Board Members (whether Whole Time Directors or Part Time Directors including Independent and Nominee Directors) Senior Management Personnel of the Company.

4. **Preamble**:
The Code sets forth standards of conduct that Bharat Global Developers Limited (the Company) requires from all of its Directors and Senior Management Personnel (Senior Management comprise of all members of the Management one level below the executive directors including all Functional Heads).

In adopting this Code, the Company seeks to:

Establish the procedures for dealing with any potential conflict of interest which may arise between the responsibilities of a Director and/or Senior Management Personnel and any other outside interest which he/she or a connected party may have.

The prompt internal reporting to an appropriate person or persons identified below of violations of this Code;

Accountability for adherence to this Code of Conduct

5. **No Conflicts of Interest**:

Each Director and Senior Management personnel is expected to avoid any outside activity, financial interest or relationship that may present a possible conflict of interest or the appearance of a conflict.

A “conflict of interest” arises when a Director or Senior Management Personnel's private interest interferes in any way, or even appears to interfere, with the interest of the Company.
A Director or Senior Management Personnel takes any action or has interest that makes it difficult to perform his/her duties for the Company objectively and effectively.

A Director or Senior Management personnel receives a personal benefit as a result of his/her position against the interest of the Company.

6. **Disclosure of Conflicts of Interest**:

All Directors/ Senior Management Personnel shall disclose the potential conflict of personal interest that they may have relating to all material financial and commercial transactions to the Board of Directors.

7. **Compliance with Laws, Rules and Regulations**:

All Directors and Senior Management Personnel are expected to comply with all laws, rules and regulations, including insider trading laws, in each jurisdiction in which it does business.

8. **Confidential of Information**:

The Director/Senior Management Personnel of the Company shall observe strict secrecy and confidentiality with regard to all transactions/dealings & affairs of the Company and shall not disclose to any person save as may be authorized by the Board of Directors or use otherwise than solely for the benefit of the Company in the course of his/her duties or as may be required by law or for smooth conduct of the Company’s business.

9. **Reporting of Illegal act or misconduct:**

The Company actively promotes honesty and transparency in all its business activities and disclosure any type of misconduct in the Company.

All Directors and Senior Management Personnel are required to report violations of laws, rules and regulations by any employee of the Company to the Board of Directors

or the Whole-time Director as may be relevant. Every effort will be made to protect the confidentially of those furnishing information.

10. **Accountability for Adherence to this Code; Violations of this code**:

Each Director and Senior Management Personnel has a personal responsibility to ensure that he or she abides by this Code. Management has the additional responsibility of fostering a culture in which compliance with the Company's policies and all applicable laws is at the core of all Company's business activities.

Concerns about appropriate conduct must be promptly addressed with care and respect.
The Directors and Senior Management Personnel shall affirm compliance with this code on an annual basis each year.

The values and responsibilities set forth in this code are important to the Company and must be taken seriously by all concerned. Accordingly, violations of these values and responsibilities will lead to disciplinary action by the Board of Directors.

Such disciplinary action may include reprimand, reimbursement of any loss or damage suffered by the Company, termination of employment or any other disciplinary action deemed appropriate by the Company.

11. **Placement of the Code on Website**:

Pursuant to Regulation 46 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, this Code and any amendments thereto shall be posted on the website of the Company.

12. **Acknowledgement of Receipt of this Code**:

All Board Members and Senior Management Personnel shall acknowledge the receipt of this Code or any modification(s) thereto, in the acknowledgement form and forward the same to the Company Secretary.

Code of Conduct

GENERAL CODE OF CONDUCT

The Corporate Governance Policy is the apex instrument guiding affairs of the Company and clearly defines the roles, responsibilities and authorities of the key people in the governance of the Company.

This code forms an integral part of the Company's Governance Policy. As required under Sebi (LODR) Regulations, 2015 the following code of conduct is applicable and strictly followed by the Members of the Board of Directors and Senior Management of the Company.

National Interest

The Company shall conduct its business affairs in accordance with the economic development and foreign policy objectives of the country and strive to make a positive contribution at the international, national and regional levels. It shall not undertake any activity that will have any adverse impact on the social and cultural life of the citizens.

Equal - Opportunities Employer

The Company provides equal opportunities to qualified applicants for employment, without regard to their race, caste, religion, colour, ancestry, marital status, sex, age, etc. Employees of the Company are treated with dignity and it maintains a work environment free of sexual harassment. Employees are encouraged to take additional responsibilities so to provide equal opportunity for upward mobility on merit-based system.

A Gender Friendly Workplace

The Company is committed to a gender friendly workplace. It provides equal opportunities for men and women; it institutes good employment practices; and abhors sexual harassment at the workplace.
"Sexual harassment includes unwelcome physical contact, demand or request for sexual favours, sexually coloured remarks, showing pornography, and any other unwelcome physical, verbal or nonverbal conduct of a sexual nature. RLL encourages employees to report any harassment and has instituted proper method to take appropriate action, when required."

Ethical Conduct

All Employees of the Company, including Members of the Board of Directors and Senior Management of the Company, shall deal on behalf of the Company with professionalism, honesty and integrity, as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be as such by third parties.

Use of Company Assets

All assets of the Company, tangible and intangible, shall be employed for the purpose of conducting the business for which they are duly authorized. None of the assets of the Company should be misused or diverted for personal purpose.

Gifts and Donations

The Company shall neither receive nor offer or make, directly or indirectly, any illegal payments, remunerations, gifts, donations or benefits to obtain business or uncompetitive favours for the conduct of its business. However, nominal gifts for special events can be exchanged by employees provided the same is disclosed to the management immediately.

Government Agencies

The Company and its employees shall not offer or give any Company funds or property as donation to any government agencies or their representatives, directly or through intermediaries, in order to obtain any favourable performance of official duties.

Political Non – Alignment

The Company shall not publicly support any specific political party or candidate for political office. The Company shall not offer or give any company funds or property as donations to any specific political party, candidate or campaign. The employees are free to exercise their democratic rights on individual basis without implying, directly or indirectly, any involvement of the Company.

Citizenship

The officers and employees of the Company shall be free to pursue an active role in civic or political affairs as long as it does not adversely affect the business or interests of the Company.

Conflict of Interest

Any Director or Management Employee of the Company shall not engage in any business, relationship or activity, which might detrimentally conflict with the interest of the Company. A conflict of interest, actual or potential, may arise when, directly or indirectly:

1. A person engages in a business relationship or activity with anyone who is party to a transaction with the Company.

2. A person derives benefit to any of his/her relatives by making or influencing decision relating to any transaction of the Company.

3. An independent judgment in the best interest of the Company cannot be exercised for personal reasons.

4. A person or his/her relatives investment in any Company which is an actual or potential competitor, supplier, customer, distributor, joint venture or other alliance partner of the Company (ownership of up to 1 per cent of the subscribed share capital of a publicity held company shall not ordinarily constitute a financial interest for this purpose).

5. A person conducts/influences business on behalf of the Company with a supplier or customer of whom his/her relative is a principal, officer or representative, resulting in a benefit to him/her or his/her relative.

6. A person awards benefits, such as increase in salary or other remuneration, posting, promotion or recruitment of a relative of an employee of the Company, where such an individual is in a position to influence the decision with regard to such benefits.

7. A person accepts gifts, donations, hospitality and/or entertainment beyond the customary level from existing or potential suppliers, customers or other third parties which have business dealing with the Company unless a full disclosure, in writing, has been made to the Company's management or the Board of Directors and approval received in writing.

8. A person accepts employment, a position of responsibility (such as a consultant or a director) or provides 'freelance' services to any other Company without approval of the Board of Directors of the Company.

Corporate Opportunities

An officer shall not exploit for his/her personal gain, opportunities that are discovered through the use of Company property, information or position, unless the opportunity is disclosed fully in writing to the Company's Board of Directors and the Board declines to pursue such opportunity.

Representation

The officers shall not write, appear or represent himself as the Company to any third party unless authorized by the Company in writing.

Cost Consciousness

All the directors and senior management employees of the Company should strive for optimum utilization of available resources. They shall exercise care to ensure that costs are reasonable and there is no wastage and ostentation in Company expenditure shall be avoided.

Integrity

Every officer and employee of the Company shall ensure the integrity of data or information furnished to the Company.

Transparency

All directors, officers and employees shall ensure that their actions in the conduct of business are totally transparent expect where the need of business security dictate otherwise. Such transparency shall be brought about through appropriate policies, systems and processes including as appropriate, segregation of duties, tiered approval mechanism and involvement of more than one manager in key decisions and maintaining supporting records. Operations and activities shall be audited periodically to ensure transparency.

Confidentiality

All directors and management employees shall ensure that any confidential information gained in their official capacity is not utilized for personal profit or for the advantage of any other person. They shall not disclose in writing/verbal any facts, figures, information, trade secrets and/or confidential documents obtained during the course of business relationship with Company to any person/authority/organization/statutory body unless required by law and/or with specific written permission of the Company. They shall not provide any information either formally or informally to the press or to any other publicity media unless specifically authorized to do so. They shall adhere to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 1992

Intellectual Property Rights

All documents, processes, manuals, literature, systems etc. or any other intellectual property developed or created by the officers during the association with the Company are sole Intellectual Property of the Company.

Quality of Products and Services

The Company and its officers shall be committed to supply goods and services of the highest quality standards, backed by efficient after sales service consistent with the requirements of the customers to ensure their total satisfaction. The quality standards of the Company's goods and services shall meet the required national standards and the Company shall endeavor to achieve international standards.

Competition

The Company and its officers shall strive to establish and support a competitive, open market economy. Specifically, the Company shall not engage in activities, which generate or support formation of monopolies, cartels and similar unfair trade practices. The Company and its officers shall market the products and services of the Company on its own merits and shall not make unfair and misleading statements about the Company's or competitors' products and services. Any collection of competitive information shall be made only in the normal course of business through legally permitted means.

Financial Reporting and Records

The Company and its officers shall prepare and maintain accounts of the Company's business affairs fairly and accurately in accordance with the generally accepted accounting and financial reporting standards. Internal accounting and audit procedures shall fairly and accurately reflect all of the Company's business transactions and disposition of assets. All required information shall be accessible to Company auditors and other authorized parties and government agencies. There shall be no willful omission of any transaction from the books and records, no advance income recognition, and no hidden bank account and funds.

Health, Safety and Environment

The Company and its officers shall strive to provide a safe and healthy working environment in the conduct of the business affairs of the Company, with all regulations regarding the preservation of the environment. The Company and its officers shall be committed to prevent the wasteful use of natural resources and minimize any hazardous impact of the production, use and disposal of any of its products and services on the environment.

Legal Compliances

All directors and officers of the Company shall ensure compliance with all the relevant laws and regulations affecting operations of the Company. They shall keep abreast of the affairs of the Company and be kept informed of the Company's compliance with relevant laws, rules and regulations. In the event that the implication of law is not clear, the course of action chosen must be supported by eminent legal counsel whose opinion should be documented. Violations of applicable governmental laws, rules and regulations may subject them to individual criminal or civil liability, as well as it may also subject the Company to civil or criminal liability or the loss of business.

Shareholders

The Company shall be committed to enhance shareholder value and comply with all regulations and laws that govern shareholders' rights. The Board of Directors of the Company shall duly and fairly inform its shareholders about all relevant aspects of the Company's business, and disclose such information in accordance with the respective regulations and agreements.

Securities Transactions and Insider Information

The officers and employees of the Company and his or her immediate family shall not derive any benefit or assist others to derive any benefit from the access to and possession of information about the Company, which is not in the public domain. The officers and employees of the Company shall not use or proliferate information which is not available to the investing public for making or giving advice on investment decisions on the securities of the Company. Such insider information might include the following:

· Financial results of the Company including profits, earnings and dividends;

·Announcement of new product introductions or developments;

· Major supply and delivery agreements;

· Raising finances;

· Assets revaluations;

· Restructuring plans;

· Divestiture of businesses or business units;

· Investment plans;

· Expansion/new projects;

· Acquisition, amalgamation, merger or takeover;

· Issue of new securities or buy back of its own shares;

Interaction with Media

The Directors and officers of the Company, other than the designated spokespersons, shall not

engage with any member of press and media in matters concerning the Company. Instead they

should direct any requests to the designated spokespersons.

Reporting Concern

Every officer and employee of the Company shall promptly report to the management any violation of this code, or an event that could affect the business or reputation the Company.

Waivers

Any waiver of any provision of this Code of Conduct for a director, officer or employee must be placed for approval before the Company's Board of Directors and such waiver shall be granted in writing.

Violation

Any instance of violation of this Code of Conduct shall be brought to the attention of the immediate reporting authority or the Board of directors and shall be dealt with appropriately.

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

(As approved by the Board of Directors of the Company at its duly held and convened meeting)

1. Introduction:

The Securities Exchange Board of India (SEBI), for protection of investors and to regulate the securities market, had formulated SEBI (Prohibition of Insider Trading) Regulations, 2015, applicable to all listed companies. Further, SEBI (Prohibition of Insider Trading) (Amendment) (Regulation 2018) notified on January 21, 2019 requires every listed company, inter alia, formulate a policy for determination of 'Legitimate Purpose' as a part of this code under regulation 8 of SEBI PIT Regulation. Accordingly, the Board of Directors in their meeting adopted this new Code of Conduct covering a policy of determination of 'Legitimate Purpose'. The revised code of conduct applicable from April 01, 2019.

2. Objective:

Bharat Global Developers Limited endeavors to preserve the confidentiality and to prevent the misuse of un-published price sensitive information (UPSI). The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all applicable laws and regulations. Every director, officer, designated person of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. No director, officer, designated person may use his or her position or knowledge of the Company to gain personal benefit or to afford advantage to any third party.

This code of conduct is applicable on following persons:

1. Promoters including member(s) of Promoter group

2. Board of Directors

3. Designated Persons

4. Connected Persons

5. Senior Management

3. Definitions:

1. "Act" means the Securities and Exchange Board of India Act, 1992;

2. "Code of Conduct" shall mean the Code of Internal Procedures and Code of Conduct for Regulating, Monitoring and Reporting of trading by Insiders of Bharat Global Developers Limited as amended from time to time;

3. "Compliance Officer means Company Secretary of the Company or any other person who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations.

4. "Connected Person" means

(i). any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its

officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(ii).Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,

a. an immediate relative of connected persons specified in clause (i); or

b. a holding company or associate company or subsidiary company; or

c. an intermediary as specified in section 12 of the Act or an employee or director thereof; or

d. an investment company, trustee company, asset management company or an employee or director thereof; or

e. an official of a stock exchange or of clearing house or corporation; or

f. a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or

g. a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or

h. an official or an employee of a self-regulatory organization recognised or authorized by the Board; or

i. a banker of the company; or

j. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;

5. "Designated Persons(s)" shall mean:

(i). Directors of the Company;

(ii). Chief Executive officer/Chief Financial officer/Company Secretary

(iii). Chief Administrative officer / Chief Operating Officer

(iv). Invitees to the board meeting and committee meetings

(v). Members of executive committee of the Company not being directors

(vi). Employees in the cadre of Manager and above;

(vii). Personal assistant/secretary to all the above persons;

(viii). Employees of the company who have access to UPSI and as may be decided by the management in consultation with compliance officer of the company;

(ix). Persons employed on contract basis and performing similar roles or having similar responsibilities as persons mentioned in (ii), (iii) and (vi) above;

(x). And such other persons as may be notified by the Compliance Officer as per directions of the Board.

6. "Digital Database" means a platform maintained in electronic form to store such information as per provisions of the Regulations;

7. "Immediate relative" means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities;

8. "Insider" means any person who is:

(i). a connected person; or

(ii).in possession of or having access to unpublished price sensitive information;

9. "Material Financial Relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months of the immediately preceding financial year, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

10. "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

11. "Trading Window" means a trading period for trading in Company's securities as specified by the company from time to time.

12. "Unpublished Price Sensitive Information" means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information

relating to the following: –

(i). Financial results;

(ii). Dividends;

(iii). Change in capital structure;

(iv). Mergers, De-mergers, Acquisitions, Delistings, disposals and expansion of business and such other transactions;

(v). Changes in key managerial personnel.

(vi). such other information as determined by the Board of Directors/Chief Executive Officer/Chief Operating Officer/Chief Financial Officer from time to time. (Regulation 2(1)(n)).

4. Safeguarding Of "Unpublished Price Sensitive Information":.

The Designated Persons shall retain the privacy of all Unpublished Price Sensitive Information and shall not disclose any such information to any person directly or indirectly by way of making an advice for the purchase or sale of securities.

All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

5.Trading Restrictions:

The designated persons of the Company shall be subject to trading restrictions as enunciated below:-

- Trading Window: The period prior to declaration of unpublished price sensitive information is mostly sensitive for transactions in the Company's securities. This sensitivity is due to the fact that the Designated Persons will, during that period, often have unpublished price sensitive information. During such sensitive times, the Designated Persons will have to give up the chance of trading in the Company's securities. The Designated Persons of the Company shall not deal in the securities of the Company when the trading window is closed.
- ·The trading window shall be closed when the compliance officer determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Designated persons and their immediate relatives shall not trade (including but not limited to buying or selling or both) in securities when the trading window is closed.

- The period of closure related to UPSI due to preparation of financial results shall be effective from the end of every quarter till 48 hours after declaration of financial results.

- All the Designated Persons shall strictly conduct all their Trading in the Securities of the Company only when the Trading Window is open and no Designated Person shall trade in the Securities of the Company during the period the Trading Window is closed or during any other similar period as may be specified by the Compliance Officer from time to-time.

- The timing for re-opening of the trading window shall be determined by the compliance officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

6. Reporting Requirements For Transactions In Securities:

Initial Disclosure:

Every person on appointment as a Key Managerial Personnel or a Director of the company or upon becoming a Promoter shall disclose his holding of securities of the company in the prescribed Form B, as on the date of appointment or becoming a Promoter, to the company within seven days of such appointment or becoming a Promoter.
You can refer Form B format on below link:

https://www.bseindia.com/downloads1/Revised_Format_PIT2015.pdf

Continual Disclosures:
Every Promoter, Director and Designated Persons of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any

calendar quarter, aggregates to a traded value in excess of Rs.10,00,000/- (Rupees Ten Lakhs) in the prescribed Form C.
You can refer Form C format on below link:
https://www.bseindia.com/downloads1/Revised_Format_PIT2015.pdf

The disclosure by the company shall be made within 2 working days of the receipt of intimation of allotment of shares in Form C or becoming aware of such information.

Disclosure by the company to the Stock Exchange(s):
The disclosure by the company shall be made within 2 working days of the receipt of intimation of allotment of shares or becoming aware of such information in the prescribed Form D.
You can refer Form D format on below link:
https://www.bseindia.com/downloads1/Revised_Format_PIT2015.pdf

7. Trading Plan:
An insider shall be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure of the same pursuant to which trades may be carried out on his behalf in accordance with such plan.

The designated person shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan as per conditions and restrictions specified under the Regulations.

The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any Unpublished Price Sensitive Information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such Unpublished Price Sensitive Information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

Provided that pre-clearance of trades shall not be required for any trades in accordance with the trading plan once trading plan has been approved by the compliance officer.

Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with the trading plan approved by the compliance officer.

Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

8.Pre Clearance Of Trades:

Prior to approving any trades, the compliance officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

The trades that have been pre-cleared have to be executed within seven trading days by the designated person, failing which fresh pre-clearance would be needed for the trades to be executed.

9.Contra Trade:

A designated person shall not be permitted to execute a contra trade for six months.
The compliance officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. A contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

10. Code Of Fair Disclosure:

The Company shall adhere to the following principles of fair disclosure of unpublished price sensitive information in letter as well as in spirit:

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary of the Company shall act as a compliance officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
7. The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle all unpublished price sensitive information on a need to-know basis i.e. Unpublished Price Sensitive Information may be disclosed where such disclosure is in furtherance of legitimate purposes, discharge of legal obligations or to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of such information

The Unpublished price sensitive information can be shared as an exception by an Insider for Legitimate purposes in the ordinary course of business and administration of the Company. The Company has a Policy for determination of Legitimate Purposes for which the UPSI can be shared, which has been attached with this Code and marked as "Annexure-A", provided it is not shared to evade or circumvent the prohibition under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015.
The Company has a Policy for procedure of inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, which has been attached with this Code and marked as "Annexure-B".

11.Penalty:

- Every Insider shall be individually responsible for complying with the provisions of the Insider Trading Regulations and the Code to the extent applicable.
- Any violation under this Code shall attract serious disciplinary action by the Company.
- The action by the Company will be taken as per SEBI Regulations of Insider Trading.

"Annexure-A"

POLICY ON DETERMINATION OF LEGITIMATE PURPOSES:
[Pursuant to Regulation 3 (2A) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

This Policy, as a part of "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" formulated under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations 2015 (here in after referred as "the Regulation") and subsequently amended vide Regulation 3(2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, will be known as "Policy for Determination of Legitimate Purposes" hereinafter referred to as the "Policy"

The objective of this policy is to identify 'Legitimate Purposes' for performance of duties or discharge of legal obligations, which will be considered as an exception for the purpose of procuring unpublished price sensitive information (UPSI) relating to the Company or its listed securities or proposed to be listed securities, if any.

"Legitimate purpose" pursuant to the provisions of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with the following persons, where such communication is for performance of duties or discharge of legal obligations or for need-to-know basis etc., provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

1. Promoters/Promoter Group of the Company
2. Auditors (Statutory, Internal, Secretarial and any other Auditor as applicable)
3. Staff Members of the Audit firm/team conducting the Audit
4. Lenders
5. Customers
6. Suppliers
7. Bankers
8. Merchant Bankers
9. Legal Advisors
10. Regulatory Authorities
11. Advertising Agencies
12. Insolvency Professionals
13. Consultants
14. Any other advisors/consultants/partners
15. Any other person with whom UPSI is shared

Persons in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of Insider Trading Regulations.

For the purpose of determining the 'legitimate purposes', following factors must be satisfied:
1. It must be shared in the Ordinary of Course of Business or for Corporate Purposes;
2. It is required to be done in furtherance of fiduciary duties or in fulfilment of any statutory obligation;
3. Information shared is in the interest of other shareholders/stakeholders and
4. Information is not being shared for personal benefit even if it may result in personal gain consequently.

The Company shall execute an agreement with, or communicate to, all Insiders, who are in possession of UPSI, for confidentiality/ non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.

Maintenance of Structured Digital Database:

The Company shall maintain a structured digital database containing the names of such persons or entities as the case may be with whom information is shared under this code read with PIT Regulations, along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available.
The said digital database shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

"Annexure-B"

POLICY FOR PROCEDURE OF INQUIRY IN CASEOF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION ("UPSI")

[Under Regulation 9A of SEBI (Prohibition of Insider Trading) Regulations, 2015]

The SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 has mandated every listed company to formulate a written policy and procedures for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and inform the Board promptly of such leaks, inquiries and results of such inquiries.

In this regard, Board of Directors of KKRRAFTON DEVELOPERS LIMITED laid down this policy for procedure of inquiry in case of leak of Unpublished Price Sensitive Information or suspected leak of Unpublished Price Sensitive Information ('the policy'), for adoption.
This Policy for Procedure of Inquiry in case of Leak of Unpublished Price Sensitive Information ("Policy") came into force with effect from 1st April, 2019 in accordance with SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

Objectives:

The policy have following objectives:

(i). To strengthen the internal control system to prevent leak of UPSI.
(ii). To restrict and prohibit the practice of sharing of UPSI, with the un-authorized person, which originates from within the company and which affects the market price of the Company as well as loss of reputation and investors' / financers' confidence in the company.

(iii). To have a uniform code to curb the un-ethical practices of sharing UPSI by Insiders, Employee(s) & Designated Persons with any person, firm, Company or Body Corporate.
(iv). To initiate inquiry in case of leak of UPSI or suspected leak of UPSI and inform the same to the Securities and Exchange Board of India ("SEBI") promptly.
(v). To penalize any Insider, Employee & Designated Persons who appears to have found guilty of violating this policy.

The Company endeavours to preserve the confidentiality of unpublished price sensitive information (UPSI) and to prevent misuse of such information. The Company shall strive to restrict and prohibit the practice of sharing of UPSI which originates from within the company by any promoter, director, key managerial person, insider, employee, designated person, support staff or any other known or unknow person(s) with any un-authorized person which affects the market price of the Company as well as causes loss of reputation and investors' / financers'
confidence in the Company.
Leak of UPSI shall mean communication of information which is / shall be UPSI by any Insider, Employee & Designated Persons or any other known or unknown person to any person other than a person(s) authorized by the Board after following the due process prescribed in this behalf in the Code of Practices Fair Disclosure of the Company and /or under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading)
Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

Disclosure Of Actual Or Suspected Leak Of UPSI To Stock Exchanges:

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, the Compliance Officer shall ensure that the same shall be promptly intimated to the Stock Exchanges on which the securities of the Company are listed in the format as prescribed.

Report Of Actual Or Suspected Leak Of UPSI To Sebi:

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, the Compliance Office shall ensure that a report on such actual or suspect leak of UPSI, preliminary enquiry thereon and results thereof shall be promptly made to the SEBI in the format as prescribed.

Procedure For Enquiry In Case Of Leak Of UPSI:

On suo-moto becoming aware or otherwise, of actual or suspected leak of Unpublished Price Sensitive Information of the Company by any promoter, director, key managerial person, insider, employee, designated person, support staff or any other known or un-know person, the Compliance Officer after informing the same to the Managing Director or CEO or Chief Financial Officer of the Company, shall follow the below mentioned procedure in order to enquire and/or investigate the matter:

(a) To take Cognizance of the matter:

The Audit Committee shall meet within a period of one week after receipt of the information of actual or suspected leak of unpublished price sensitive information and take cognizance of the matter and decide as follows.
(i). If it is found that the allegation is frivolous, not maintainable or outside the scope, the same may be dismissed.
(ii). If it is found that the issue requires further investigation, Preliminary Enquiry may be initiated.

(b) Preliminary Enquiry:

Preliminary enquiry is a fact-finding exercise which shall be conducted by the Compliance Officer. The object of preliminary enquiry is to ascertain the truth or otherwise of the allegations contained in the information or complaint, if any, and to collect necessary available material in support of the allegations, and thereafter to decide whether there is justification to embark on any disciplinary action.

The Audit Committee, if required and in addition to Compliance Officer may also appoint and / or authorize any person(s), as it may deem fit, to initiate/conduct an enquiry to collect the relevant fact, material substances on actual or suspected leak of UPSI.

If an inquiry has been initiated by a listed company in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, the relevant intermediaries and fiduciaries shall co-operate with the listed company in connection with such inquiry conducted by listed company.

(c) Report of Preliminary Enquiry to the Enquiry Committee:

The Compliance Officer or Person(s) appointed/authorized to enquire the matter of actual or suspected leak of UPSI submit his/her report to the Audit Committee within one week from the date of his appointment on this behalf.

(d) Disciplinary Action:

The Disciplinary action(s) shall include wage freeze, suspension, recovery, clawback, termination of employment contract/agreement etc., as may be decided by the Members of the Committee.

Amendments:

The Board of Directors of the Company, in sync with applicable laws, rules & regulations, may amend/substitute any provision(s) with a new provision(s) or replace this entire code with a new code. In any circumstance where the terms of the Code differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over the code.

Any amendment to the Code, upon approval of the Board of the Company shall be intimated to the Stock Exchanges and shall also be updated in the company's official website.

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

(As approved by the Board of Directors of the Company at its meeting held on 01.09.2009)

In line with Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 as amended from time to time, (hereinafter referred to as the "Regulations") the following Code of Conduct (hereinafter referred to as the "Code") is implemented for prevention of Insider Trading in the Securities of the Company:

Policy and Obligations

The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every director, officer, designated employee of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. No director, officer, designated employee may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

To achieve these objectives, Sequel E-routers Limited (hereinafter referred to as "the Company") notifies that this Code of Conduct is to be followed by all directors, officers, designated employees.

Part A
Definitions

'Insider Trading': When insiders use unpublished price sensitive information to arrive at securities trading (including buying as well as selling) decisions, the action is referred to as insider trading;

'Compliance Officer' means the Company Secretary of the Company. In absence of the Company Secretary the Board of Directors may authorized any officer of the Company to discharge the duties of Compliance Officer under the regulations;

'Dealing in Securities' means buying, selling or agreeing to subscribe, sell or deal in any securities either as principal or agent and includes exercising of options;

'Designated Employee' shall mean:

1. Managing Director, Whole-time Directors and other Executive and Non-executive Directors
2. All employees of the Company at Manager Level and above
3. Every employee of Accounts, Finance, Internal Audit, Legal and Secretarial Departments, as well as in the Offices of the Chairman/Managing Director/Executive Director by whatever name designated
4. Relatives of the aforesaid persons
5. Employees designated by the Board of Directors from time to time to whom the trading restrictions shall be applicable; 'Dependent Family Members' shall mean the employee's spouse, dependent parents and dependent children;

'Price Sensitive Information' means any information, which relates directly or indirectly to a Company and which if published, is likely to materially affect the price of securities of Company.

Explanation: The following shall be deemed to be price sensitive information:-

1. Periodical financial results of the Company
2. Intended declaration of dividends (both interim or final)
3. Issue of securities or buy-back of securities
4. Any major expansion plans or execution of new projects
5. Amalgamation, mergers or takeovers
6. Disposal of the whole or substantial part of the undertaking
7. Any changes in policies, plans or operations of the Company
8. Revision of credit ratings assigned to any debt or equity instrument of the Company
9. Disruption of operations due to natural calamities;
10. Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the Company;

'Unpublished' means information which is not published by the Company or its agents and is not specific in nature.

'Employee' means a persons who is in temporary or permanent employment of the Company and include Designated Employee.

Part B

1. Compliance Officer

1.1. The listed Company has appointed Mr. Kamlesh Dave (Executive Director / Company Secretary) as compliance officer who shall report to the other Directors of the Company.

1.2. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of "Price Sensitive Information" Pre-clearing; of designated employees and their dependents, trades (directly or through respective department heads as decided by the Company), monitoring of trades and implementation of the code of conduct under the overall supervision of the Board of the listed Company.

1.3. The compliance officer shall maintain a record of the designated employees and any changes made in thelist of designated employees.

1.4. The compliance officer shall assist all the employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 and the Company's code of conduct.

2. Preservation of "Price Sensitive Information

Designated Employees, Directors, Officers shall maintain the confidentially of all Price Sensitive Information. Employees/directors shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities. Following practices should be followed in this regard:

2.1. Need to Know Price Sensitive Information is to be handled on a "Need to Know" basis, i.e. Price Sensitive Information should be disclosed only to those within the company who need the information to discharge their duty.

2.2. Limited access to confidential information Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc. Files containing confidential information should be deleted/destroyed after its use.

3. Prevention of misuse of "Price Sensitive Information"

3.1. Trading Restrictions All directors/officers and designated employees of the Company shall be subject to trading restrictions as enumerated below.

3.2. Trading Window The company shall specify a trading period to be called "Trading Window", for trading in the company's securities. The trading window shall be closed during the time the information referred to in para 3.3 is unpublished.

3.3. The trading window shall be, inter alia, closed at the time of:-

- Periodical financial results of the Company

- Intended declaration of dividends (both interim or final)
- Issue of securities or buy-back of securities
- Any major expansion plans or execution of new projects
- Amalgamation, mergers or takeovers
- Disposal of the whole or substantial part of the undertaking
- Any changes in policies, plans or operations of the Company
- Revision of credit ratings assigned to any debt or equity instrument of the Company
- Disruption of operations due to natural calamities;
- Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the Company;

3.4. The time for commencement of closing of trading window shall be effective from 1st day of the month in which the meeting of the Board of Directors is proposed to be held or from the date of circulation of notice & agenda pertaining to the above subject para 3.2, which is longer, upto 24 hours after the information is made public.

3.5. All directors/officers/designated employees of the company shall conduct all their dealings in the securities of the company only in valid trading window and shall not deal in any transaction involving the purchase or sale of the company's securities during the periods when trading window is closed or during any other period as may be specified by the company from time to time.

3.6. In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.

4. Pre-clearance of Trades

All directors/officers/designated employees of the company who intend to deal in the securities of the company (above a minimum threshold limit to be decided by the company) should pre-clear the transaction as per the pre- dealing procedure as described hereunder:-

4.1. An application may be made in such form as the company may notify in this regard, to the Compliance Officer indicating the estimated number of securities that the designated employee / officer / director intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.

4.2. An undertaking shall be executed in favour of the company by such designated employee/director/officer incorporating, inter alia, the following clauses, as may be applicable:

a. That the employee/director/officer does not have any access or has not received "Price Sensitive Information" up to the time of signing the undertaking.

b. That in case the employee/director/officer has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the company till the time such information becomes public.

c. That he/she has not contravened the code of conduct for prevention of insider trading as notified by the company from time to time.

d. That he/she has made a full and true disclosure in the matter.

5. Other Restrictions

5.1. All directors/officers/designated employees shall execute their order in respect of securities of the company with in one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, the employee/director must pre-clear the transaction again.

5.2. All directors/officers/designated employees shall hold their investments in securities for a minimum period of 30 days in order to be considered as being held for investment purpose.

5.3. In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the compliance officer after recording in writing his/her reasons in this regard.

6. Reporting Requirements for Transactions in Securities

6.1. All directors/officers/designated employees of the listed company shall be required to forward followingdetails of their securities transactions including the statement of dependent family members (as definedby the Company) to the Compliance Officer:

a. all holding in securities of that company by directors/officers/ designated employees at the time of joining the Company

b. periodic statement of any transactions in securities (the periodicity of reporting may be defined by the company. The company may also free to decide whether reporting is required for trades where preclearance is also required); and

c. Annual statement of all holdings in securities.

6.2. The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the directors/officers/designated employees for a minimum period of three years.

6.3. The Compliance Officer shall place before the Managing Director/Chief Executive Officer or a committee specified by the company, on a monthly basis all the details of the dealing in the securities by employees/ director/officer of the company and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged in this code

7. Penalty for contravention of code of conduct

7.1. Any Director/officer/employee who trades in securities or communicates any information for trading in securities in contravention of the code of conduct may be penalized and the company may take appropriate action.

7.2. Directors/officers/employees of the company who violate the code of conduct shall also be subject to disciplinary action by the company, which may include wage freeze, suspension for future participation in employee stock option plan etc.

7.3. The action by the company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulation, 1992.

8. Information to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 1992

In case it is observed by the Company/Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 1992. The Company shall inform to the SEBI.

Part - C

Code of Corporate Disclosure Practices for prevention of Insider Trading

1. Corporate Disclosure Policy

1.1. To ensure timely and adequate disclosure of price sensitive information, the following norms shall be followed by listed companies:

2. Prompt disclosure of price sensitive information

2.1. Price sensitive information shall be given by listed companies to stock exchanges and disseminated on a continuous and immediate basis.

2.2. Listed companies may also consider ways of supplementing information released to stock exchanges by improving Investor access to their public announcements.

3. Overseeing and co-ordinating disclosure

3.1. Listed companies shall designate a senior official (such as compliance officer) to oversee corporate disclosure.

3.2. This official shall be responsible for ensuring that the company complies with continuous disclosure requirements. Overseeing and co-ordinating disclosure of price sensitive information to stock exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure.

3.3. Information disclosure/dissemination may normally be approved in advance by the official designated for the purpose.

3.4. If information is accidentally disclosed without prior approval, the person responsible may inform the designated officer immediately, even if the information is not considered price sensitive.

4. Responding to market rumors

Listed companies shall have clearly laid down procedures for responding to any queries or requests for verification of market rumors by exchanges.

The officialdesignated for corporatedisclosure shall be responsible for deciding whethera public announcement is necessary for verifying or denying rumors and then making the disclosure.

5. Timely Reporting of shareholdings/ownership and changes in ownership

5.1. Disclosure of shareholdings/ownership by major shareholders and disclosure of changes in ownership as provided under any Regulations made under the Act and the listing agreement shall be made in a timely and adequate manner.

5.2. Disclosure/dissemination of Price Sensitive Information with special reference to Analysts, Institutional Investors.

6. Listed companies should follow the guidelines given hereunder while dealing with analysts and institutional investors:

i. Only Public information to be provided - Listed companies shall provide only public information to the analyst/ research persons/large investors like institutions. Alternatively, the information given to the analyst should be simultaneously made public at the earliest.

ii. Recording of discussion - In order to avoid misquoting or misrepresentation, it is desirable that at least two companies representative be present at meetings with Analysts, Brokers or Institutional Investors and discussion should preferably be recorded.

iii. Handling of unanticipated questions - A listed company should be careful when dealing with analysts' questions that raise issues outside the intended scope of discussion. Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.

iv. Simultaneous release of Information - When a company organizes meetings with analysts, the company shall make a press release or post relevant information on its website after every such meet. The company may also consider live web-casting of analyst meets.

7. Medium of disclosure/dissemination

i. Disclosure/dissemination of information may be done through various media so as to achieve maximum reach and quick dissemination.

ii. Corporates shall ensure that disclosure to stock exchanges is made promptly.

iii. Corporates may also facilitate disclosure through the use of their dedicated Internet website.

iv. Company websites may provide a means of giving investors a direct access to analyst briefing material, significant background information and questions and answers.

v. The information filed by corporates with exchanges under continuous disclosure requirement may be made available on the company website.

8. Dissemination by stock exchanges

i. The disclosures made to stock exchanges may be disseminated by the exchanges to investors in a quick and efficient manner through the stock exchange network as well as through stock exchange websites.

ii. Information furnished by the companies under continuous disclosure requirements, should be published on the website of the exchange instantly.

iii. Stock exchanges should make immediatearrangement for displayof the information furnished by the companiesinstantly on the stock exchange website

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

FORM - A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 [Regulation 13(1) and (6)] Regulation 13(1) - Details of acquisition of5% or more shares in a listed company

Name & address of shareholder -with telephone number	Shareholding prior to acquisition	No. and percentage of shares/voting rights acquired	Date of receipt of allotment /advice. Date of acquisition (specify)	Date of intimation to Company	Mode of acquisition (market purchase / public / rights / preferential offer etc.)	Shareholding subsequent to acquisition	Trading member through whom the trade was executed with SEBI Registration No.of the TM	Exchange on which the trade was executed	Buy quantity	Buy value

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road, Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 [Regulation 13(2) and (6)] Regulation 13(2)—Details of shares held by Director or Officer of a listed company

Name & Address of Director / Officer	Date of assuming office of Director / Officer	No. &%of shares/voting rights held at the time of becoming Director/ Officer	Date of intimation to Company	Mode of acquisition (market purchase / public / rights / preferential offer etc.)	Trading member through whom the trade was executed with SEBI Registration No.of the TM	Exchange on which the trade was executed	Buy quantity	Buy value

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road, Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Form C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 [Regulation 13(3) and (6)J Regulation 13(3)—Details of change in shareholding in respect of persons holding more than 5% shares in a listed company

Name & address of sharehol der – with telephon e number	Shareh olding prior to acquisit ion	No.and percen tage of shares/ voting rights sold	Date of Receipt of allotment advice/ acquisition of shares/ sale of shares (specify)	Date of intimation to Company	Mode of acquisiti on (market purchase / public / rights / preferen tial offer etc.)	No. & % of shares/ voting rights post acquisitio n / sale
Trading member through whom the trade was execute d with SEBI Registrat ion No.of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell Quantity	Sell Value	

(+91)79- 49229525
inquiry@bgdl.co.in
A 707, Sun West Bank, Ashram Road, Ahmedabad,380009- Gujarat (India)
www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Form D

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 [Regulation 13(4) and (6)J Regulation 13(4)—Details of change in shareholding of Director or Officer of a Listed Company

Name & Address of Director / Officer	No. &%of shares/voting rights held by Director/ Officer	Date of Receipt of allotment advice/ acquisition of shares/ sale of shares (specify)	Date of intimation to Company	Mode of acquisition (market purchase / public / rights / preferential offer etc.)	No. & % of shares/ voting rights post acquisition / sale	Trading member through whom the trade was executed with SEBI Registration No.of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell Quantity	Sell Value

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road, Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in

Form - E

Date:

The Compliance Officer KKRRAFTON DEVELPOERS LIMITED
1, ANKUR COMPLEX, 2ND FLOOR, B/H.TOWN HALL, OPP. HASUBHAI CHAMBERS, ELLISBRIDGE, AHMEDABAD 380006

Sub: Application for Pre-Clearance of trade in the securities of the Company

Dear Sir,
I S/D/W/o , being a Director / Officer / Designated Employee of the Company hereby seek your approval for:

a. buying (number) of (type of security) of the Company in my / dependent family members' name,

b. selling (number) of (type of security) of the Company in my / dependent family members' name,

Through Stock Exchange/private arrangement with M/s / Mr./ Mrs.- having folio no. / DP & Client ID No._____.

As on date, I/my dependent family members hold the under mentioned securities of the Company:

I furtherundertake and confirmthat:

a.I do not have any access to or in receipt of any "Price Sensitive Information" up to the time of signing this undertaking.

b.In case, I get access to or receive any " Price Sensitive Information" subsequent to the signing of this undertaking but prior to the execution of the transaction, I shall inform you of the change in my position and that I would completely refrain from dealing in the securities of the Companytill the time such information becomes public.

c.I have not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.

d.I have made a full and true disclosure in the matter.

e.I / my dependent family shall execute the transaction in respect of the proposed securities of the Company within one week after the approval of pre-clearance is obtained. In the event of the transaction not being executed within one week from the said approval, I shallagain apply for pre-clearance approval for the transaction.

I / my dependentfamily members undertaketo hold the said securities for a minimumperiod of 30 days in order to be considered as being held for investment purpose

Yours Faithfully,

Name Designation Signature

FAMILIARIZATION PROGRAMMES FOR INDEPENDENT DIRECTORS

(Disclosure under Regulation 25 and 46 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

1. Objective:

The primary objective of this policy is to familiarize the Independent Directors through various programmes about the listed entity, including the following:

a) Nature of the industry in which the Company Operates;

b) Business model of the company;

c) Roles, rights, responsibilities of Independent Director; and

d) Any other relevant information;

2. Definitions:

a) "Act" means the Companies Act, 2013, as may be amended from time to time.

b) "Board of Directors" or "Board" means the Board of Directors of Crop Life Science Limited, as constituted from time to time.

c) "Company" means Kkrrafton Developers Limited.

d) "Independent Director" means a Director of the Company, not being a whole-time director and who satisfies other criteria for independence under the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

e) Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other applicable law or regulation, amended from time to time.

3. Familiarisation Programmes

A. Initial Familiarisation

As and when a new Independent Director is appointed, as a part of the process of induction, the Company has the practice of familiarizing the new Director with information on various aspects of the company, including the following:

a) Brief introduction of the Company;
b) Memorandum & Articles of Association of the Company;
c) Company's Code of Conduct for Directors
d) Profile of Board of Directors and Senior Management Personnel;
e) Details of Composition of various Committees of the Board and terms of reference thereof;
f) Code of Conduct for prevention of Insider Trading;
g) Various Policies / Charters adopted by the Board; and
h) Latest Annual Report.

Further, The Company shall also issue a detailed letter of appointment to the Independent Directors at their appointments/re-appointment containing, inter alia, their role, responsibilities etc.

B. Continual Familiarisation

The Presentations will regularly be made to the Board and its various Committees, where the Directors/Committee Members get an opportunity to interact with the Senior Management Team including the Statutory and the Internal Auditors of the Company. Such presentations inter alia cover the following:

a) the performance of the Company,
b) operating results,
c) management outlook on business,
d) economic/industry developments,
e) Industry updates,
f) financials, risks and mitigation plans,
g) compliances,
h) regulatory scenario etc.

An informal Meeting of Independent Director with the senior management Personnel of the Company shall be held to bring out the greater interaction amongst them for a better overall understanding of the Functions and operational mechanism of the Company. Site visits to various plant locations are organized for the Directors to enable them to understand the operations of the Company.

4. Policy Review

The policy shall be periodically reviewed and brought in conformity with statutory and regulatory requirements, as and when required.

5. Interpretation

In any circumstance where the provisions of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the relevant law, rule, regulation or standard will take precedence over this Policy until such time as this Policy is changed to conform to the said law, rule, regulation or standard.

6. Disclosure

The Policy is disclosed on Company's website i.e. www.bgdl.co.in

Disclosure under Regulation 30(5) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Contact details of Key Managerial Personnel who have been authorised by the Board of Directors of KKRRAFTON DEVELOPERS LIMITED ("the Company") for the purpose of determining materiality of an event or information under regulation 30 of Listing Regulations and disclosure of the same to the stock exchanges

Sr. No.	Name	Designation	Contact Details
1	Mr. Ashok Sewda	Managing Director	Phone:- +919998006779 E-mail:- sales@bgdl.co.in
2	Ms. Dhruvi Kothari	Company Secretary	Phone:- +919998589123 E-mail:- cs@bgdl.co.in

NOMINATION AND REMUNERATION POLICY

1. Introduction

The Nomination & Remuneration Policy ("Policy") of KKRRAFTON DEVELOPERS LTD is formulated under the requirements of applicable laws, including the Companies Act, 2013.

The Policy is intended to identify persons qualified to become Directors and to set out criteria to

determine remuneration to the Directors, Key Managerial Personnel (KMP), senior management

(as defined below) and other employees of the Company and to recommend to the Board for their

appointment and removal.

2. Objective and Purpose

The objectives and purpose of this Policy are:

- To formulate the criteria for determining qualifications, competencies, positive attributes and independence for appointment of a director (executive/non-executive/independent) of the Company; and
- To recommend policy relating to the remuneration of the Directors, KMP and Senior Management to the Board of Directors of the Company.

3. Constitution of the Nomination and Remuneration Committee

The Board has constituted the "Nomination and Remuneration Committee" of the Board on 18th January, 2024. This is in line with the requirements under the Companies Act, 2013 ("Act").

The Board has authority to reconstitute this Committee from time to time.

4. Definitions

a. 'Board' means Board of Directors of the Company.

b. 'Directors' means directors of the Company.

c. 'Committee' means Nomination and Remuneration Committee of the Company as constituted or reconstituted by the Board, in accordance with the Act.

d. 'Company' means BHARAT GLOBAL DEVELOPERS LTD.

e. 'Independent Director' means a Director referred to in Section 149(6) of the Companies

Act, 2013 and rules.

f. 'Key Managerial Personnel (KMP)' means) the Managing Director or Chief Executive Officer or manager

ii) Whole-time Director

iii) the Company Secretary;

iv) the Chief Financial Officer; and

v) Such other officer as defined under the Companies Act, 2013 from time to time.

Unless the context otherwise requires, words and expressions used in this Policy and not defined

herein but defined in the Companies Act, 2013 shall have the meaning respectively assigned to

them therein.

5. Matters to be dealt with, perused and recommended to the Board by the Nomination and Remuneration Committee

The following matters shall be dealt with by the Committee:

(a) Size and composition of the Board:

Periodically reviewing the size and composition of the Board to have an appropriate mix of executive and independent Directors to maintain its independence and separate its functions of governance and management and to ensure that it is structured to make appropriate decisions, with a variety of perspectives and skills, in the best interests of the Company;

(b) Directors:

Formulate the criteria determining qualifications, positive attributes and independence of a Director and recommend candidates to the Board when circumstances warrant the appointment of a new Director, having regard to qualifications, integrity, expertise and experience for the position.

(c) Succession plans:

Establishing and reviewing Board, KMP, and Senior Management succession plans in order to ensure and maintain an appropriate balance of skills, experience and expertise on the Board and Senior Management.

(d) Remuneration framework and policies:

The Committee is responsible for reviewing and making recommendations to the Board on:

i) Remuneration of executive Directors to be presented for shareholders' approval including severance, if any.

ii) Individual and total remuneration of non-executive Directors and the chairman (if nonexecutive), including any additional fees payable for membership of Board committees;

iii) the remuneration policies for KMP and Senior Management including base pay, incentive payments, retirement right.0s, severance pay if any and service contracts having regard to the need to:

a) attract and motivate talent to pursue the Company's long-term growth;

b) demonstrate a clear relationship between executive compensation and performance;

c) be reasonable and fair, having regard to best governance practices and legal requirements and

d) balance between fixed and incentive pay reflecting short and long-term performance objectives as appropriate for the Company and its goals.

6. Policy for appointment and removal of Directors, KMP and Senior Management

(a) Appointment criteria and qualifications

1. The Committee shall ascertain the integrity, qualification, expertise and experience of the person identified for appointment as Director, KMP or Senior Management and recommend to the Board his/her appointment. The Committee has discretion to decide whether qualification, expertise and experience possessed by a person is sufficient / satisfactory for the position.

2. A person to be appointed as Director, KMP or Senior Management should possess adequate qualification, expertise and experience for the position he / she is considered for.

(b) Term / Tenure

1. Managing Director / Whole-time Director

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

2. 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, 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.

- Performance Evaluation Criteria of Independent Directors:

1. Understanding of nature and role of independent directors' position;

2. Active engagement with the Management and attentiveness to progress of decisions taken;

3. Driving any function or identified initiative based on domain knowledge and experience;

4. Proactive, strategic and lateral thinking.

(c) Removal

Due to reasons for any disqualification mentioned in the Companies Act, 2013, rules made thereunder or under any other applicable Act, rules and regulations, the Committee may recommend, to the Board with reasons recorded in writing, removal of a Director, KMP or Senior Management subject to the provisions and compliance of the said Act, rules and regulations.

(d) Retirement

The Directors, KMP and Senior Management shall retire as per the applicable provisions of the Companies Act, 2013 and the prevailing policy of the Company. The Board will have the discretion to retain the Directors, KMP and Senior Management in the same position / remuneration or otherwise, even after attaining the retirement age, for the benefit of the Company.

7. Policy relating to the remuneration for Directors, KMP and Senior Management

(a) General

1. The remuneration / compensation / commission etc. to be paid to Directors will be determined by the Committee and recommended to the Board for approval.

2. The remuneration and commission to be paid to the Managing Director/Whole-time Director shall be in accordance with the provisions of the Companies Act, 2013, and the rules made thereunder.

3. Increments to the existing remuneration / compensation structure may be recommended by the Committee to the Board which should be within the limits approved by the Shareholders in the Case of Managing Director/ Whole-time Director.

4. Where any insurance is taken by the Company on behalf of its Directors, KMP and Senior Management for indemnifying them against any liability, the premium paid on such insurance shall not be treated as part of the remuneration payable to any such personnel, provided that if such person is proved to be guilty, the premium paid on such insurance shall be treated as part of the remuneration.

(b) Remuneration to other employees

The compensation for other employees would be as per the compensation policy of the Company, as revised through the annual compensation review process from time to time and approved by the Chief Executive Officer Chief Operating Officer, in consultation with the Head- HR.

(c) Minimum remuneration to Managing Director and Whole-time Directors

If, in any financial year, the Company has no profits or its profits are inadequate, the Company shall pay remuneration to its Managing Director and Whole-time Directors in accordance with the provisions of Schedule V of the Companies Act, 2013.

(d) Remuneration to Non-Executive / Independent Directors

The remuneration payable to each Non-Executive Director and independent Director is based on the remuneration structure as determined by the Board, and is revised from time to time, depending on individual contribution, the Company's performance, and the provisions of the Companies Act, 2013 and the rules made thereunder. The Independent Directors shall not be entitled to any stock incentive of the company.

8. Policy review

(a) This Policy is framed based on the provisions of the Companies Act, 2013 and rules thereunder.

(b) In case of any subsequent changes in the provisions of the Companies Act, 2013 or any other regulations which makes any of the provisions in the policy inconsistent with the Act or regulations,

then the provisions of the Act or regulations would prevail over the policy and the provisions in the policy would be modified in due course to make it consistent with law.

(c) This policy shall be reviewed by the Nomination and Remuneration Committee as and when any changes are to be incorporated in the policy due to change in regulations or as may be felt appropriate by the Committee. Any changes or modification to the policy as recommended by the Committee would be placed before the Board of Directors for their approval.

POLICY FOR DETERMINING MATERIAL SUBSIDIARIES

1. Introduction

The Board of Directors (the "Board") of BHARAT GLOBAL DEVELOPERS LTD (the "Company) has adopted the

following policy and procedures with regard to determination of Material Subsidiaries, as

defined in this Policy below.

This policy shall be applicable to the Company with effect from _____

2. Objective

This policy deals with determination of Material Subsidiaries OF BHARAT GLOBAL DEVELOPERS LTD in terms of regulation 16 (1) (c) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter termed as "Listing Regulations") which states that the Company shall formulate a policy for determination of the Material Subsidiary and the policy is intended to ensure the governance framework of material subsidiary companies.

3. Definitions

3.1 "Act" means Companies Act, 2013 & rules made there under.

3.2 "Audit Committee" or "Committee" means Audit Committee constituted by the Board of Directors of the Company, from time to time, under provisions of section 177 of the Companies Act, 2013 and Regulation 18 of the Listing Regulations.

3.3 "Board of Director" or "Board" means the Board of Directors of Apollo Tyres Ltd, as constituted from time to time.

3.4 "Company" means BHARAT GLOBAL DEVELOPERS LTD.

3.5 "Holding Company" in relation to one or more other Holding Company means a company of which such companies are subsidiary companies.

3.6 "Independent Director" means a director of the Company who satisfies the criteria for independence under Section 149 of Companies Act, 2013 and Regulations 16 (1) (b) of Listing Regulations.

3.7 "Material Subsidiary" - shall mean a subsidiary, whose income or net worth exceeds 20% of the consolidated income or net worth respectively of the Company and its subsidiaries in the immediately preceding accounting year.

3.8 "Subsidiary Company" shall mean a subsidiary as defined under Section 2(87) of the Companies Act, 2013 and rules related thereto.

3.9 "Significant transaction or arrangement" shall mean any individual transaction or arrangement that exceeds or is likely to exceed 10% of the total revenues or total expenses or total assets or total liabilities, as the case may be, of the unlisted subsidiary for the immediately preceding accounting year

4. Criteria For Determining Material Subsidiary

A subsidiary shall be considered as a Material Subsidiary, if any of the following conditions are satisfied:

If the income of the Subsidiary Company exceeds 20% of the consolidated income or networth of the company and its subsidiaries in the immediately preceding accounting year; or

5. Provision With Regard To Subsidiary Companies

5.1 At least one Independent Director on the Board of Directors of the Company shall be a director on the Board of Directors of an unlisted material Subsidiary Company, incorporated in India or not.

For the purpose of this clause 5.1, "Material Subsidiary" shall mean a Subsidiary, whose income or net worth exceeds 20% of the consolidated income or net worth respectively, of the Company and its Subsidiaries in the immediately preceding accounting year.

5.2 The Audit Committee of the company shall review the financial statements, in particular the investments made by the unlisted subsidiary company.

5.3 The minutes of the Board meetings of the unlisted subsidiary company shall be placed at the Board meeting of the listed company.

5.4 The management of the unlisted subsidiary Company shall periodically bring to the attention of the Board of Directors of the company, a statement of all significant transactions & arrangements entered into by the unlisted subsidiary company;

5.5 Subsidiary company shall not either by its own or through its nominees, holds any shares in its holding company & no holding company shall allot or transfer its shares to any of its subsidiary companies & any such allotment or transfer of shares of a company to its subsidiary company shall be void.

6. Disposal Of Material Subsidiary

6.1 The Company shall not, without prior approval by way of passing a special resolution in its General Meeting:

a. Reduce its shareholding (either on its own or together with other subsidiaries) to less than 50 % or cease the exercise of control over the subsidiary; or

b. Sell, dispose and lease the assets amounting to more than 20% of the assets of the material subsidiary on an aggregate basis during a financial year

6.2 The provision of clause 6.1 shall not be applicable in cases where such divestment, sale, disposal, lease as the case may be is made under a scheme of arrangement duly approved by the Court/Tribunal or under a resolution plan duly approved under Section 31 of the insolvency code and such an event is disclosed to the recognized stock exchanges within one day of the resolution plan being approved.

7. Disclosure

7.1 This Policy Shall Be Disclosed On The Company's Website At _____

7.2 Web link thereto shall be provided in the Annual Report of the Company.

8. Amendment And Updations

8.1 The Board shall have the power, subject to applicable laws, to amend any of the provisions of this policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy. The Company Secretary being the Compliance Officer is also authorized to make amendment in this policy, where there is any statutory changes necessitating the amendment in the policy.

8.2 The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance.

POLICY FOR DETERMINING MATERIALITY OF EVENTS

1. Objective

The Policy is framed in accordance with the requirements of the Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations). The objective of the Policy is to determine materiality of events or information of the Company and to ensure that such information is adequately disseminated in pursuance with the Regulations and to provide an overall governance framework for such determination of materiality.

2. Scope

The Policy has been prepared in accordance with the applicable provisions of the Listing Regulations.

This Policy describes, inter alia, the illustrative list of events or information which are considered to be material as per the Listing Regulations and/ or in the opinion of Board. The Board vide this Policy has attempted to prescribe guidance for deciding the magnitude of the materiality of events and information.

This policy shall be put on the website of the Company.

3. Definitions & Interpretations

In this Policy, unless the context otherwise requires:

(a) “Board” shall mean the Board of Directors of the Company and shall include any Committee thereof authorized for the purpose.

(b) “Company” shall mean KKRRAFTON DEVELOPERS LIMITED.

(c) “Committee” means any Committee formed under the delegated authority of the Board.

(d) “Key Managerial Personnel” means key managerial personnel as defined in sub-section (51) of section 2 of the Companies Act, 2013.

(e) “Listing Regulations” shall mean SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015, including any modifications, amendments, clarifications, circulars or re-enactment thereof.

(f) “Net worth” means net worth as defined in sub-section (57) of section 2 of the Companies Act, 2013

(g) "Stock Exchange" means a recognised stock exchange as defined under clause (f) of section 2 of the Securities Contracts (Regulation) Act, 1956 on which Equity shares of the Company are listed.

(h) "Turnover" means turnover as defined in sub-section (91) of section 2 of the Companies Act, 2013.

Words and expressions used and not defined in the Policy shall have the same meanings respectively assigned to them in the Listing Regulations and/or Companies Act 2013.

4. Guidelines For Determining Materiality Of Events Or Information

Events / information shall be considered as Material if it meets any of the following criteria:
(a) The Omission of an event or information which is likely to result in discontinuity or alteration of event or information already available publicly; or

(b) The Omission of an event or information which is likely to result in significant market reaction if the said omission came to light at a later date; or

(c) The Omission of an event or information whose value or the expected impact in terms of value, exceeds the lower of the following:
(i) 2% of Turnover, as per the last audited consolidated financial statements of the Company;
(ii) 2% of Net Worth, as per the last audited consolidated financial statements of the Company, except in case the arithmetic value of the net worth is negative;
(iii) 5% of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the Company;

(d) Any other event/information which in the opinion of the Board of Directors of the Company is considered as material event/information.

'Absolute value of profit or loss after tax' means absolute figures of profit/ loss. The threshold with respect to profit/ loss is to be computed by taking the absolute values of profit or loss after tax for the immediately preceding three audited consolidated financial statements of the Company.

5. Timeframe For Disclosures Of Events Or Information

(a) In accordance with Amended Regulations, all events or information which are material shall be first disclosed to Stock Exchanges as soon as reasonably possible and in any case not later than the following:
(i) 30 minutes from the closure of the meeting of the board of directors in which the decision pertaining to the event or information has been taken;
(ii) 12 hours from the occurrence of the event or information, in case the event or information is emanating from within the Company;
(iii) 24 hours from the occurrence of the event or information, in case the event or information is not emanating from within the Company.

(b) The disclosure with respect to events for which timelines have been specified in Part A of Schedule III of the Listing Regulations shall be made within such timelines.

(c) In case the Company discloses any event or information after the timelines specified under the

Listing Regulations, it shall, along with such disclosure provide the explanation for the delay.

(d) The listed entity shall, with respect to disclosures referred to in this regulation, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed, with relevant explanations.

(e) The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

(f) The listed entity shall disclose all events or information with respect to subsidiaries which are material for the listed entity.

(g) The company shall provide specific and adequate reply to all queries raised by stock exchange(s) with respect to any events or information. Provided that the stock exchange(s) shall disseminate information and clarification as soon as reasonably practicable.

(h) In case where an event occurs or information is available with the company, which has not been indicated in Annexure A or Annexure B, but which may have material effect on it, the listed entity is required to make adequate disclosures in regard thereof.

(i) In case an event or information is required to be disclosed by the listed entity in terms of the provisions of this regulation, pursuant to the receipt of a communication from any regulatory, statutory, enforcement or judicial authority, the listed entity shall disclose such communication, along with the event or information, unless disclosure of such communication is prohibited by such authority.

6. Market Rumour Verification

With effect from 1st October, 2023 or such other date as may be prescribed under the Listing Regulations, and as applicable to the Company, the Company shall confirm, deny or clarify any reported event or information in the mainstream media which is not general in nature and which indicates that rumors of an impending specific material event or information in terms of the provisions of the Listing Regulations are circulating amongst the investing public, as soon as reasonably possible and not later than 24 hours from the reporting of the event or information. If the Company confirms the reported event or information, it shall also provide the current stage of such event or information. Until then, the Company may on its own initiative also, confirm, deny or clarify any reported event or information to Stock Exchange(s).

7. Authority To Key Managerial Personnel

Managing Director and Chief Financial Officer of the Company shall severally have the authority to determine Materiality of any event or information and Company Secretary and Compliance Officer shall make disclosures of the same to stock exchange(s), subject to the provisions of this Policy.

Contact details:
Email: cs@bgdl.co.in
Phone - +91 9998006779

8. Assistance To Relevant Employees

Relevant employees shall be guided by this Policy in identifying any potential material event/ information, which comes to their knowledge and the same shall be reported to the Managing Director and Chief Financial Officer of the Company for determining the materiality of the said event/information and making necessary disclosures to the Stock Exchange(s).

9. Amendments

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

10. Scope And Limitation

In the event of any conflict between the provisions of this Policy and SEBI (LODR) Regulations, 2015, Companies Act, 2013, Regulations or any other statutory enactments, rules, the provisions of such Listing Agreement/ Companies Act, 2013, Regulations or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

11. Dissemination Of Policy

This Policy shall be hosted on the website of the Company and address of such web link thereto shall be provided in the Annual Report of the Company

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

(+91)79- 49229525

A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)

inquiry@bgdl.co.in

www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

(+91)79- 49229525

A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)

inquiry@bgdl.co.in

www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

(+91)79- 49229525

A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)

inquiry@bgdl.co.in

www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

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

4 Nov, 2024

Subject: Outcome of board meeting held on 04th November 2024.

Ref.: BSE Script code: - 521238
Dear Sir,
The Board of Directors of the Company in its Meeting held on 04th November 2024 has considered and approved the following:

1.Appointment of Mr. Keyurkumar Pravinbhai Patel (DIN:10822762) as an Additional Director designated as Non-Executive Independent Director, not liable to retire by rotation, for a tenure of 5 consecutive years commencing from 04th November 2024 to 04th November 2029, subject to approval of the shareholders.

2.Reconstitution of Committees of the Board as under:
A.Nomination and Remuneration Committee
I.Mr. Rakesh Dutta, Independent Non-Executive Director- Chairman
II.Mr. Keyurkumar Pravinbhai Patel, Independent Non-Executive Director- Member
III.Mrs. Nirali P Karetha, Non-Executive Director- Member

B.Audit Committee
I.Mr. Rakesh Dutta, Independent Non-Executive Director- Chairman
II.Mr. Keyurkumar Pravinbhai Patel, Independent Non-Executive Director- Member
III.Mr. Ashok Kumar Sewda, Managing Director-Member

C.Stakeholders' Relationship Committee
I.Mrs. Nirali P Karetha, Non-Executive Director- Chairman
II.Mr. Keyurkumar Pravinbhai Patel, Independent Non-Executive Director- Member
III.Mr. Rakesh Dutta, Independent Non-Executive Director- Member

(+91)79- 49229525
inquiry@bgdl.co.in
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

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

4 Nov, 2024

Subject: Outcome of board meeting held on 04th November 2024.

Ref.: BSE Script code: - 521238
Dear Sir,
The Board of Directors of the Company in its Meeting held on 04th November 2024 has considered and approved the following:

1.Appointment of Mr. Keyurkumar Pravinbhai Patel (DIN:10822762) as an Additional Director designated as Non-Executive Independent Director, not liable to retire by rotation, for a tenure of 5 consecutive years commencing from 04th November 2024 to 04th November 2029, subject to approval of the shareholders.

2.Reconstitution of Committees of the Board as under:
A.Nomination and Remuneration Committee
I.Mr. Rakesh Dutta, Independent Non-Executive Director- Chairman
II.Mr. Keyurkumar Pravinbhai Patel, Independent Non-Executive Director- Member
III.Mrs. Nirali P Karetha, Non-Executive Director- Member

B.Audit Committee
I.Mr. Rakesh Dutta, Independent Non-Executive Director- Chairman
II.Mr. Keyurkumar Pravinbhai Patel, Independent Non-Executive Director- Member
III.Mr. Ashok Kumar Sewda, Managing Director-Member

C.Stakeholders' Relationship Committee
I.Mrs. Nirali P Karetha, Non-Executive Director- Chairman
II.Mr. Keyurkumar Pravinbhai Patel, Independent Non-Executive Director- Member
III.Mr. Rakesh Dutta, Independent Non-Executive Director- Member

(+91)79- 49229525
inquiry@bgdl.co.in
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
www.bgdl.co.in

3.Considered holding of Extra-ordinary General Meeting of the shareholders of the Company on 29th November, 2024 at 02:00 pm at Registered office of the Company .

4.Approved the Notice of the Extra-Ordinary General to be held on 29th November, 2024
The Meeting commenced at 02:30P.M. and concluded at 03:30 P.M.

Please kindly take into your records.
Thanking You,
Yours faithfully,
FOR, BHARAT GLOBAL DEVELOPERS LIMITED
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Annexure-I
Information as required under Regulation 30 - Part A of Para A of Schedule III of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015

S. No.	Name	KEYURKUMAR PRAVIN BHAI PATEL
1.	Reason for Change	Mr. Keyurkumar Pravinbhai Patel (DIN :10822762) has been appointed as an additional Director in the capacity of Independent Director of the company to hold office of Independent Director for a period of for a tenure of 5 consecutive years commencing from 06th November 2024 to 06th November 2029, subject to approval of the shareholders.
2.	Date of Appointment and term of Appointment:	Date: 06/11/2024 Term of Appointment: 5 consecutive years commencing from 06th November 2024 to 06th November 2029, subject to approval of the shareholders.
3.	Brief Profile (in case of appointment of a director)	Mr. Keyurkumar Pravinbhai Patel is a committed professional with a strong academic background and real-world sales management experience. He has developed a strong analytical and problem-solving skill set that enhances his ability to drive sales strategies and improve operational efficiency.

(+91)79- 49229525
inquiry@bgdl.co.in
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
www.bgdl.co.in

4.	Disclosure of relationships between directors	Nil
5.	Affirmation that the Director being appointed is not debarred from holding the office of director by virtue of any SEBI order or any other such authority	To the best of our knowledge and information, we hereby affirm that Mr. Keyurkumar Pravinbhai Patel is not debarred from holding the office of director by virtue of any SEBI order or any other such authority.

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

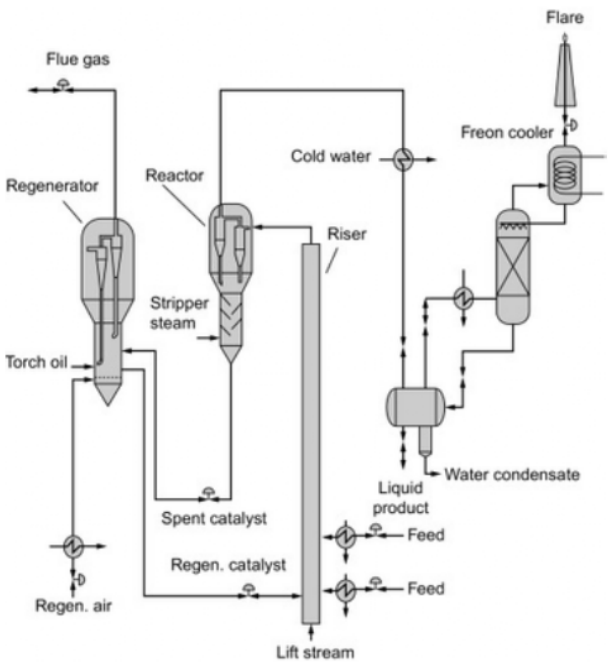
MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Disclaimer:
For reference purposes, an illustrative image is included at the end of this document. This image is intended solely for visual representation and does not reflect actual project details or specifications.





For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Annexure-A

Details required under Regulation 30 of the Listing Regulations read with SEBI Circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123

S. No.	Details Required	Response
1.	Name of the entity awarding the order(s)/contract(s)	Reliance Industries LTD.
2.	Significant terms and conditions of order(s)/contract(s) awarded in brief	**Order Value:** ₹1.2 Billion **Deliverables**: engineering, and construction of a Full-Fledged High Capacity Fluidised Catalytic Cracker (FCC) unit
3.	Whether order(s) / contract(s) have been awarded by domestic/international entity	Domestic
4.	Nature of order(s) / contract(s)	Engineering, and Construction of a Full-Fledged High Capacity Fluidised Catalytic Cracker (FCC) unit
5.	Time period by which the order(s)/contract(s) is to be executed	within 6 Months
6.	Broad consideration or size of the order(s)/contract(s)	INR 1,200,000,000
7.	Whether the promoter/promoter group/group companies have any interest in the entity that awarded the order(s)/contract(s)? If yes, nature of interest and details thereof	No
8.	Whether the order(s)/contract(s) would fall within related party transactions? If yes, whether the same is done at "arm's length"	No

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

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

27th Dec, 2024

Subject: Intimation of Business Expansion and Formation of New Subsidiaries under Regulation 30 of SEBI (LODR) Regulations, 2015

Dear Sir/Madam,
With reference to our intimation dated October 30, 2024 relating to incorporation of a wholly owned subsidiaries of the Company and pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), we hereby wish to inform that, the Ministry of Corporate Affairs has approved incorporation of two wholly owned subsidiaries of the Company under name different from the proposed names due to non-availability of the intially Proposed Names.

The details of the newly incorporated subsidiaries and their respective names are as follows:
1. "Seedwave Agro Impex Private Limited" and
2."Windiant Solar Private Ltd."

The Ministry of Corporate Affairs, has issued a Certificate of Incorporation for the same on December 26, 2024.

The details as required under Regulation 30 of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 read with SEBI circular SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 and SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023. is attached herewith as "Annexure A".

Kindly take the same on record and oblige.
For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

(+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

Name of the target entity, details in brief such as size, turnover etc.;	**Seedwave Agro Impex Pvt Ltd** **CIN**: U46209GJ2024PTC157413 **Authorised Capital**: Rs. 1,00,000 divided into 10,000 Equity shares of Rs. 10 each **Turnover**: Nil (yet to Commence business operations)
Whether the acquisition would fall within related party transaction(s) and whether the promoter/promoter group/ group companies have any interest in the entity being acquired? If yes, nature of interest and details thereof and whether the same is done at "arm's length"	This would be being Wholly Owned Subsidiary, Promoters will not have any interest in this.
Industry to which the entity being acquired belongs	Agriculture and AgriTech innovations
Objects and effects of acquisition (including but not limited to, disclosure of reasons for acquisition of target entity, if its business is outside the main line of business of the listed entity);	Focused on agriculture and AgriTech innovations, this subsidiary aims to pioneer organic and sustainable farming solutions. With the Indian organic food market projected to grow at a CAGR of 20.5% over the next five years, Company is strategically placed to lead in this evolving sector.
Brief details of any governmental or regulatory approvals required for the acquisition;	Not Applicable
Indicative time period for completion of the acquisition;	Not Applicable
Nature of consideration - whether cash consideration or share swap and details of the same;	100% Subscription to the share Capital.
Cost of acquisition or the price at which the shares are acquired;	The contribution to initial share capital will be made at face value.
Percentage of shareholding/control acquired and/or number of shares acquired;	100 %
Brief background about the entity acquired in terms of products/line of business acquired, date of incorporation, history of last 3 years turnover, country in which the acquired entity has presence and any other significant information (in brief);	Not Applicable

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Name of the target entity, details in brief such as size, turnover etc.;	**Windiant Solar Pvt ltd.** **CIN:** U35105GJ2024PTC157407 **Authorised Capital:** Rs. 1,00,000 divided into 10,000 Equity shares of Rs. 10 each **Turnover:** Nil (yet to Commence business operations)
Whether the acquisition would fall within related party transaction(s) and whether the promoter/promoter group/ group companies have any interest in the entity being acquired? If yes, nature of interest and details thereof and whether the same is done at "arm's length"	This would be being Wholly Owned Subsidiary, Promoters will not have any interest in this.
Industry to which the entity being acquired belongs	Renewable Energy Projects
Objects and effects of acquisition (including but not limited to, disclosure of reasons for acquisition of target entity, if its business is outside the main line of business of the listed entity);	This subsidiary will focus on renewable energy projects, including solar, wind, and hybrid solutions, contributing to India's target of achieving 50% of its energy from non-fossil fuel sources by 2030. With the global renewable energy market projected to grow at a CAGR of 10% by 2030, this subsidiary is well-positioned to capitalize on the growing demand for green energy solutions.
Brief details of any governmental or regulatory approvals required for the acquisition;	Not Applicable
Indicative time period for completion of the acquisition;	Not Applicable
Nature of consideration - whether cash consideration or share swap and details of the same;	100% Subscription to the share Capital.
Cost of acquisition or the price at which the shares are acquired;	The contribution to initial share capital will be made at face value.
Percentage of shareholding/control acquired and/or number of shares acquired;	100 %
Brief background about the entity acquired in terms of products/line of business acquired, date of incorporation, history of last 3 years turnover, country in which the acquired entity has presence and any other significant information (in brief);	Not Applicable.

(+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

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

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

30 Oct, 2024

Subject: Intimation of Business Expansion and Formation of New Subsidiaries under Regulation 30 of SEBI (LODR) Regulations, 2015

Dear Sir/Madam,

Pursuant to ***Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015,*** we wish to inform you that **Bharat Global Developers Ltd.** *(Formerly Known as Kkrrafton Developers ltd)* has undertaken a significant business expansion by establishing six new subsidiaries (subject to the name availability). Kindly acknowledge that the board meeting was held today at the registered office of the company. The meeting started at 11:30 PM and concluded at 12:45 P.M. The following is the outcome of the said meeting.

The newly established subsidiaries and their focus areas will be as follows:

1. Bharat Global Green Energy Pvt Ltd
This subsidiary will focus on renewable energy projects, including solar, wind, and hybrid solutions, contributing to India's target of achieving 50% of its energy from non-fossil fuel sources by 2030. With the global renewable energy market projected to grow at a CAGR of 10% by 2030, this subsidiary is well-positioned to capitalize on the growing demand for green energy solutions.

2. Bharat Global AgroTech Pvt Ltd
Focused on agriculture and AgriTech innovations, this subsidiary aims to pioneer organic and sustainable farming solutions. With the Indian organic food market projected to grow at a CAGR of 20.5% over the next five years, Bharat Global AgroTech Pvt Ltd. is strategically placed to lead in this evolving sector.

3. Bharat Global Aerospace & Defence Pvt Ltd
Operating in the aerospace and defence sectors, this subsidiary will leverage the Indian government's "Make in India" initiative. The Indian defence market is forecasted to reach ₹5 lakh crore by 2030, positioning this subsidiary to tap into the increasing demand for domestically manufactured defence technology and equipment.

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in

4. Bharat Global ImPex Pvt Ltd
This subsidiary will focus on the trading of textiles, consumer goods, and essential products. The Indian textile industry alone is expected to grow at a CAGR of 12%, providing Bharat Global ImPex Pvt Ltd. with significant opportunities in both domestic and export markets.

5. Bharat Global Gems & Mining Pvt Ltd
Engaged in the mining and trading of precious gemstones and metals, this subsidiary is poised to benefit from the global gemstone market, which is projected to reach $53.2 billion by 2030. Bharat Global Gems & Mining Pvt Ltd. aims to become a key player in this lucrative international market.

6. Bharat Global Waste Management Pvt Ltd
Specializing in waste management and recycling solutions, this subsidiary is aligned with India's growing focus on sustainable environmental practices. The global waste management market is expected to grow at a CAGR of 6%, offering significant opportunities for growth.

These subsidiaries are part of BGDL's broader strategy to diversify its business across industries that are crucial for India's economic growth and sustainability. This expansion allows BGDL to increase its revenue streams and contribute to key sectors such as green energy, agriculture, defense, and waste management.

We believe these initiatives will substantially contribute to BGDL's long-term growth and value creation for shareholders. Further details regarding each subsidiary will be provided on the Company's website and shared with the stock exchange as we continue to develop and expand these business lines.

We look forward to providing regular updates on the progress of these subsidiaries post compelete documentation and incorporation of the same, and keeping stakeholders informed about our journey toward sustainable and diversified growth.

For Bharat Global Developers Ltd.,
(Formerly Known as Kkrrafton Developers ltd)

MANAGING DIRECTOR
ASHOK KUMAR SEWDA
DIN: 06703029

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Annexure-I

Disclosure of Event and Information pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 read with SEBI circular SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 and SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023.

Name of the target entity, details in brief such as size, turnover etc.;	Name: Bharat Global Energy Pvt Ltd
Whether the acquisition would fall within related party transaction(s) and whether the promoter/promoter group/ group companies have any interest in the entity being acquired? If yes, nature of interest and details thereof and whether the same is done at "arm's length"	This would be being Wholly Owned Subsidiary, Promoters will not have any interest in this.
Industry to which the entity being acquired belongs	Renewable Energy Projects
Objects and effects of acquisition (including but not limited to, disclosure of reasons for acquisition of target entity, if its business is outside the main line of business of the listed entity);	This subsidiary will focus on renewable energy projects, including solar, wind, and hybrid solutions, contributing to India's target of achieving 50% of its energy from non-fossil fuel sources by 2030. With the global renewable energy market projected to grow at a CAGR of 10% by 2030, this subsidiary is well-positioned to capitalize on the growing demand for green energy solutions.
Brief details of any governmental or regulatory approvals required for the acquisition;	Not Applicable
Indicative time period for completion of the acquisition;	Not Applicable
Nature of consideration - whether cash consideration or share swap and details of the same;	100% Subscription to the share Capital.
Cost of acquisition or the price at which the shares are acquired;	The contribution to initial share capital will be made at face value.
Percentage of shareholding/control acquired and/or number of shares acquired;	100 %
Brief background about the entity acquired in terms of products/line of business acquired, date of incorporation, history of last 3 years turnover, country in which the acquired entity has presence and any other significant information (in brief);	The company is in process of incorporation.

(+91)79- 49229525
inquiry@bgdl.co.in
A 707, Sun West Bank, Ashram Road, Ahmedabad,380009- Gujarat (India)
www.bgdl.co.in

BHARAT GLOBAL DEVELOPERS LTD.

(Formerly Known as Kkrrafton Developers ltd)

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Name of the target entity, details in brief such as size, turnover etc.;	Name: Bharat Global AgroTech Pvt Ltd
Whether the acquisition would fall within related party transaction(s) and whether the promoter/promoter group/ group companies have any interest in the entity being acquired? If yes, nature of interest and details thereof and whether the same is done at "arm's length"	This would be being Wholly Owned Subsidiary, Promoters will not have any interest in this.
Industry to which the entity being acquired belongs	Agriculture and AgriTech innovations
Objects and effects of acquisition (including but not limited to, disclosure of reasons for acquisition of target entity, if its business is outside the main line of business of the listed entity);	Focused on agriculture and AgriTech innovations, this subsidiary aims to pioneer organic and sustainable farming solutions. With the Indian organic food market projected to grow at a CAGR of 20.5% over the next five years, Bharat Global AgroTech Pvt Ltd. is strategically placed to lead in this evolving sector.
Brief details of any governmental or regulatory approvals required for the acquisition;	Not Applicable
Indicative time period for completion of the acquisition;	Not Applicable
Nature of consideration - whether cash consideration or share swap and details of the same;	100% Subscription to the share Capital.
Cost of acquisition or the price at which the shares are acquired;	The contribution to initial share capital will be made at face value.
Percentage of shareholding/control acquired and/or number of shares acquired;	100 %
Brief background about the entity acquired in terms of products/line of business acquired, date of incorporation, history of last 3 years turnover, country in which the acquired entity has presence and any other significant information (in brief);	The company is in process of incorporation.

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Name of the target entity, details in brief such as size, turnover etc.;	Bharat Global Aerospace & Defence Pvt Ltd
Whether the acquisition would fall within related party transaction(s) and whether the promoter/promoter group/ group companies have any interest in the entity being acquired? If yes, nature of interest and details thereof and whether the same is done at "arm's length"	This would be being Wholly Owned Subsidiary, Promoters will not have any interest in this.
Industry to which the entity being acquired belongs	Aerospace & Defence
Objects and effects of acquisition (including but not limited to, disclosure of reasons for acquisition of target entity, if its business is outside the main line of business of the listed entity);	Operating in the aerospace and defence sectors, this subsidiary will leverage the Indian government's "Make in India" initiative. The Indian defence market is forecasted to reach *5 lakh crore by 2030, positioning this subsidiary to tap into the increasing demand for domestically manufactured defence technology and equipment.
Brief details of any governmental or regulatory approvals required for the acquisition;	Not Applicable
Indicative time period for completion of the acquisition;	Not Applicable
Nature of consideration - whether cash consideration or share swap and details of the same;	100% Subscription to the share Capital.
Cost of acquisition or the price at which the shares are acquired;	The contribution to initial share capital will be made at face value.
Percentage of shareholding/control acquired and/or number of shares acquired;	100 %
Brief background about the entity acquired in terms of products/line of business acquired, date of incorporation, history of last 3 years turnover, country in which the acquired entity has presence and any other significant information (in brief);	The company is in process of incorporation.

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Name of the target entity, details in brief such as size, turnover etc.;	Bharat Global Gems & Mining Pvt Ltd
Whether the acquisition would fall within related party transaction(s) and whether the promoter/promoter group/ group companies have any interest in the entity being acquired? If yes, nature of interest and details thereof and whether the same is done at "arm's length"	This would be being Wholly Owned Subsidiary, Promoters will not have any interest in this.
Industry to which the entity being acquired belongs	Gems & Mining
Objects and effects of acquisition (including but not limited to, disclosure of reasons for acquisition of target entity, if its business is outside the main line of business of the listed entity);	Engaged in the mining and trading of precious gemstones and metals, this subsidiary is poised to benefit from the global gemstone market, which is projected to reach $53.2 billion by 2030. Bharat Global Gems & Mining Pvt Ltd. aims to become a key player in this lucrative international market.
Brief details of any governmental or regulatory approvals required for the acquisition;	Not Applicable
Indicative time period for completion of the acquisition;	Not Applicable
Nature of consideration - whether cash consideration or share swap and details of the same;	100% Subscription to the share Capital.
Cost of acquisition or the price at which the shares are acquired;	The contribution to initial share capital will be made at face value.
Percentage of shareholding/control acquired and/or number of shares acquired;	100 %
Brief background about the entity acquired in terms of products/line of business acquired, date of incorporation, history of last 3 years turnover, country in which the acquired entity has presence and any other significant information (in brief);	The company is in process of incorporation.

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in

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

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Name of the target entity, details in brief such as size, turnover etc.;	Bharat Global Impex Pvt Ltd
Whether the acquisition would fall within related party transaction(s) and whether the promoter/promoter group/ group companies have any interest in the entity being acquired? If yes, nature of interest and details thereof and whether the same is done at "arm's length"	This would be being Wholly Owned Subsidiary, Promoters will not have any interest in this.
Industry to which the entity being acquired belongs	Textiles, consumer goods, and essential products
Objects and effects of acquisition (including but not limited to, disclosure of reasons for acquisition of target entity, if its business is outside the main line of business of the listed entity);	This subsidiary will focus on the trading of textiles, consumer goods, and essential products. The Indian textile industry alone is expected to grow at a CAGR of 12%, providing Bharat Global Impex Pvt Ltd. with significant opportunities in both domestic and export markets.
Brief details of any governmental or regulatory approvals required for the acquisition;	Not Applicable
Indicative time period for completion of the acquisition;	Not Applicable
Nature of consideration - whether cash consideration or share swap and details of the same;	100% Subscription to the share Capital.
Cost of acquisition or the price at which the shares are acquired;	The contribution to initial share capital will be made at face value.
Percentage of shareholding/control acquired and/or number of shares acquired;	100 %
Brief background about the entity acquired in terms of products/line of business acquired, date of incorporation, history of last 3 years turnover, country in which the acquired entity has presence and any other significant information (in brief);	The company is in process of incorporation.

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in

BHARAT GLOBAL DEVELOPERS LTD.

(Formerly Known as Kkrrafton Developers ltd)

CIN: L70100GJ1992PLC017815
GST: 24AAACP9354K1Z5

Name of the target entity, details in brief such as size, turnover etc.;	Bharat Global Waste Management Pvt Ltd
Whether the acquisition would fall within related party transaction(s) and whether the promoter/promoter group/ group companies have any interest in the entity being acquired? If yes, nature of interest and details thereof and whether the same is done at "arm's length"	This would be being Wholly Owned Subsidiary, Promoters will not have any interest in this.
Industry to which the entity being acquired belongs	Waste management and Recycling solutions
Objects and effects of acquisition (including but not limited to, disclosure of reasons for acquisition of target entity, if its business is outside the main line of business of the listed entity);	Specializing in waste management and recycling solutions, this subsidiary is aligned with India's growing focus on sustainable environmental practices. The global waste management market is expected to grow at a CAGR of 6%, offering significant opportunities for growth.
Brief details of any governmental or regulatory approvals required for the acquisition;	Not Applicable
Indicative time period for completion of the acquisition;	Not Applicable
Nature of consideration - whether cash consideration or share swap and details of the same;	100% Subscription to the share Capital.
Cost of acquisition or the price at which the shares are acquired;	The contribution to initial share capital will be made at face value.
Percentage of shareholding/control acquired and/or number of shares acquired;	100 %
Brief background about the entity acquired in terms of products/line of business acquired, date of incorporation, history of last 3 years turnover, country in which the acquired entity has presence and any other significant information (in brief);	The company is in process of incorporation.

(+91)79- 49229525
A 707, Sun West Bank, Ashram Road,
Ahmedabad,380009- Gujarat (India)
inquiry@bgdl.co.in
www.bgdl.co.in