BENTLEY COMMERCIAL ENTERPRISES LTD.

Regd. Office :Bhansali House, A-5, Off Veera Desai Road, Andheri (West), Mumbai - 400 053. Phone : (91-22) 2673 1779 • Fax : (91 -22) 2673 1796 • E-mail : bentleycommercial@gmail.com Website : www.bentleycommercialent.in • CIN : L2411OMH1985PLC035396

27th May, 2022

To,
The Manager,
The BSE Limited
Corporate Relationship Department,
2nd Floor, New Trading Wing,
Dalal Street,
Mumbai - 400 001.

Security Code: 512195

Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2022.

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with Circular No. CIR/CFD/CMDl/27 /2019 dated8th February, 2019, please find attached Annual Secretarial Compliance Report (ASCR) for the financial year ended 31st March, 2022, issued by M/s Rathi & Associates, Company Secretaries, Mumbai.

Kindly take the same on record.

Thanking you,

Yours faithfully,
For **Bentley Commercial Enterprises Limited**

MEENAKSHI BHANSALI

Digitally signed by MEENAKSHI BHANSALI
DN: c=IN, o=Personal, postalCode=400049, st=Maharashtra, 2.5.4.20=3b27c9c23fff3228d65d526463f3078d753ec6d85a9b39fd8b7aea6d7f697352, pseudonym=83C6E7AF2F25A8BE5C534ACA18BC01357F7C5EF4, serialNumber=A5B1A1C8EBA473E69E217E827BE0A822815E914C9DC18942F9A06B345CFA956D, cn=MEENAKSHI BHANSALI
Date: 2022.05.27 15:05:20 +05'30'

Meenakshi J. Bhansali
Director and Company Secretary
(DIN:06936671)

Encl: As above

Rathi & Associates
COMPANY SECRETARIES
A-303, Prathamesh, 3rd Floor, Raghuvanshi Mills Compound, 11-12, Senapati Bapat Marg, Lower Parel (W), Mumbai - 400 013.
Tel.: 4076 4444 / 2491 1222 • Fax : 4076 4466 • E-mail : associates.rathi8@gmail.com

ANNUAL SECRETARIAL COMPLIANCE REPORT

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

of

Bentley Commercial Enterprises Limited *('the Company')*

for the financial year ended 31st March, 2022

We have examined:

(a) the documents and records made available to us and explanation provided by the Company and its officers;

(b) the filings/ submissions made by the Company to the BSE Limited, from time to time;

(c) website of the Company; and

(d) document/filing, as may be relevant, which has been relied upon to make this certification,

for the financial year ended on 31st March, 2022 ("Review Period") in respect of compliance with the provisions of:

(a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and

(b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

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

(a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended;

(b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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

RATHI & ASSOCIATES ★ MUMBAI ★ COMPANY SECRETARIES

Provisions of the following Regulations and Circulars/Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') and circulars/guidelines issued thereunder were **not applicable** to the Company during the Review Period: -

a. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;

b. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

c. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

d. Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;

e. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

f. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; and

g. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.

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

a) The listed entity has complied with the provisions of the applicable Regulations as mentioned aforesaid and circulars/ guidelines issued thereunder except in respect of matters specified below:

Sr. No.	**Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)**	**Deviations**	**Observations/ Remarks of the Practising Company Secretary**
Not Applicable			

b) The listed entity has maintained proper records under the provisions of the applicable Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.

c) Details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars)* under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder,

Sr. No	Action taken by	Details of Violation	Details of action taken	Observations/ Remarks
Not Applicable				

d) The Listed entity has taken the following actions to comply with the observations made in previous reports:

Sr No.	Observations of Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended…	Actions taken by Listed entity, if any	Comments of Practising Company Secretary on the action taken by the Listed entity
Not Applicable				

For RATHI & ASSOCIATES
COMPANY SECRETARIES

RATHI & ASSOCIATES * MUMBAI * COMPANY SECRETARIES

Neha R Lahoty

NEHA R LAHOTY
PARTNER
FCS NO.: 8568
COP NO.: 10286

Date: 10th May, 2022
Place: Mumbai
UDIN: F008568D000295470