



Bombay Oxygen Investments Ltd.

(Formerly known as Bombay Oxygen Corporation Ltd.)

REGD. OFF.: 22/B, Mittal Tower, "B" Wing, Nariman Point, Mumbai - 400021. Tel.: +91-22-6610 7503-08

Fax : +91-22-6610 7513 • Email : bomoxo@mtnl.net.in • CIN : L65100MH1960PLCO11835

Sy/Bse/ 80

24th June, 2021

To,
BSE Ltd.
P.J. Towers, Dalal Street,
Mumbai - 400 001
Scrip Code: 509470

Dear Sir/ Madam,

Sub : Annual Secretarial Compliance Report for the year ended 31st March, 2021 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations')

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed the Annual Secretarial Compliance Report issued by Sanjay Dholakia & Associates, Practicing Company Secretaries for the year ended 31st March, 2021.

This is for your information and records.

Thanking you,

Yours faithfully, ,

For Bombay Oxygen Investments Limited

S. S. Navalkar

Sangeeta S. Navalkar
Company Secretary



Encl: as above



SANJAY DHOLAKIA & ASSOCIATES

BCOM LLB FCS

COMPANY SECRETARIES

GP 15, 2nd Floor, Raghuleela Mall, Behind Poincur Bus Depot, Kandivali (West), Mumbai - 400 067.
☎ : 2807 3233 / 49713233 / 98700 31365 • E-mail : sanjayrd65@gmail.com / sanjay@srdholakia.com

Secretarial compliance report of Bombay Oxygen Investments Limited (formerly known as BOMBAY OXYGEN CORPORATION LIMITED) pursuant to Regulation 24A of SEBI (LODR), Regulations, 2015 & SEBI Circular dated Feb. 8, 2019 for the year ended 31st March, 2021.

I Sanjay Dholakia, Practising Company Secretary have examined:

- (a) All the documents and records made available to us and explanation provided by Bombay Oxygen Investments Limited (Formerly known as Bombay Oxygen Corporation Limited (“the listed entity”)),
- (b) The filings / submission made by the listed entity to the stock exchanges,
- (c) Website of the listed entity,

For the year ended (“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 Contract (Regulation) Act ,1956 (“SCRA”), rules made thereunder and the Regulation, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI Act”);

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

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations ,2015;
- (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;
- (d) Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) (Amendment) Regulations, 2018;
- (e) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 And circulars / guidelines issued thereunder.

Note: The aforesaid list of SEBI regulations is only the list of Regulations which were applicable to the Company during the year under review.

And based on the above examination, I hereby report that, during the Review Period:

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



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Sr. No.	Compliance Requirement (Regulations/Circulars/Guidelines including specific clause)	Deviations	Observations /Remarks Of The Practicing Company Secretary
	NIL	NIL	NIL

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

(c) The following are the 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 E.G. Fines, Warning Letter, Debarment, Etc.	Observations/ Remarks Of The Practicing Company Secretary, If Any.
	NIL	NIL	NIL	NIL

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Initial Disclosure for Large Entity to BSE Limited	FY -2019 - 2020	Filed on 23 rd May, 2019 after the receipt of BSE's Letter	Filed on 23 rd May, 2019 as per BSE's letter asking the Company to file the same on or before 27 th May, 2019 and compiled with the same.
2.	Filing of Shareholding Pattern under Regulation 31	FY - 2019 - 2020	For the quarter ended 30 th June, 2019, filed the same on 30 th July, 2019	Paid additional delayed charges to BSE Limited for late filing and complied with the same.



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We have to state that both the above defaults were made good by the company by filing the required things with the Stock Exchanges where the Company's shares are listed.

Further we have to state that we have not carried out the physical inspection of any records maintained by the Company due to prevailing lock down conditions owing to COVID 2019 across the country. We have relied on the records as made available by the Company by digital mode and also on the Management Representation Letter issued by the Company.

For SANJAY DHOLAKIA & ASSOCIATES

SANJAY
RASIKLAL
DHOLAKIA

Digitally signed by
SANJAY RASIKLAL
DHOLAKIA
Date: 2021.06.24
14:57:10 +05'30'

(SANJAY DHOLAKIA)
Practicing Company secretary
Proprietor

Membership No. 2655
C P No.: 1798

Place: Mumbai
Date: 24th June, 2021

UDIN: F002655C000508193