



the Bonus Shares after consolidation and increase the share capital in its Board Meeting conducted on 22<sup>nd</sup> August 2017 subject to approval of shareholders in the Annual general Meeting. As per regulation 36(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the documents and information to the shareholders regarding the Annual General Meeting shall be given by not less than twenty one days before the Annual General Meeting.

2. The Board fixed the Record Date for Annual General Meeting on 22<sup>nd</sup> September, 2017 and the Annual General Meeting was held on 29<sup>th</sup> September, 2017 for Shareholders Approval as per the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. It is hereby also clarified that the resolution passed in the Annual General Meeting for Consolidation of shares should be completed before the issuance of bonus shares because company required to issue the bonus shares according to the consolidated share capital.

We would like to draw your attention to Regulation 28(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 which stipulates that the listed entity before issuing securities shall obtain In-Principle Approval from recognized stock exchange. In terms of the said regulation our company made an application seeking "In-Principle Approval" to the Bombay Stock Exchange on 12<sup>th</sup> October 2017.

3. The company was accorded "In-Principle Approval" from Bombay Stock Exchange on 17<sup>th</sup> October 2017 indicating therein :-
  - (a) Submission of listing application form for the new securities to be allotted and documents as per Format available on the website of BSE Limited under following link <http://www.bseindia.com/static/about/downloads.aspx?expandable=2>
  - (b) Payment of Additional listing fees on the enhanced capital, if applicable.
  - (c) Receipt of statutory and other approvals and compliance with guidelines issued by the statutory authorities including SEBI, RBI, MCA etc.
  - (d) Compliance with any changes in the guidelines, regulations directions of the Exchange or any statutory authorities, documentary requirements from time to time.
  - (e) Compliances with all conditions of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 as on date of listing.
  - (f) Compliances with the Companies Act, 2013 and other applicable laws.

and also mentioned that the said approval is valid up to the time specified in Regulation 95(1) of SEBI (Issue of Capital and Disclosure Requirements) Regulation 2009 (**as per annexure 1**).

4. Regulation 42(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 provides that the listed entity shall give notice in advance at least seven working days to the Stock Exchange. The company



immediately intimated Record Date to Bombay Stock Exchange on 18<sup>th</sup> October, 2017, fixing 27<sup>th</sup> October 2017 as the Record Date.

We would like to draw your attention to Regulation 42(4) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 provides that the listed entity shall ensure the time gap of at least Thirty Days between Two Record Dates. To ensure compliance with the regulation 42 in its entirety the company fixed the Record date for the purpose of issue of Bonus Shares as 27<sup>th</sup> October, 2017 having due regard to the fact that the last record date was 22<sup>nd</sup> September, 2017.

Our depository NSDL/CDSL consolidated the shares and allotted the shares on 28<sup>th</sup> October, 2017.

The company has complied all the provisions after record date and allot bonus shares on 28<sup>th</sup> October, 2017 and filled return of allotment to the ROC without making any delay (within the prescribed time period i.e. 30 days) on 08<sup>th</sup> November, 2017 vide SRN no. G60530276.

**(as per annexure 2)**

5. Without further delay immediately the company approached to the stock exchange for listing of Bonus shares on 06<sup>th</sup> November 2017 within the time frame as per regulation 108(2) of SEBI (Issue of Capital and Disclosure Requirements) Regulation 2009 and the same was obtained on 13<sup>th</sup> November, 2017 indicating therein :-
  - (a) Letters issued by National Securities Depository Ltd. (NSDL) and Central Depository Services (India) Ltd. (CDSL) confirming the credit of shares in beneficiary owner account and dispatch confirmation from Registrar for Physical share certificates. **(as per annexure 3)**
6. After obtaining Listing Approval from Bombay Stock Exchange, the company got the NSDL/CDSL Debit/Credit Certificates on 20<sup>th</sup> November 2017 and 24<sup>th</sup> November 2017 and dispatch confirmation from Registrar on 08<sup>th</sup> November 2017 respectively.
7. The Company has made an application to Bombay Stock Exchange for trading of Bonus Shares on 24<sup>th</sup> November 2017 having case no. 70366 by submitting all the relevant documents as required by BSE Letter dated 13<sup>th</sup> November, 2017 for requirement of trading approval.

Please note that it is very surprising to come to know that on 27<sup>th</sup> November 2017 the further Listing Department (BSE) mailed us that there is a violation of Regulation 95(1) of the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 in spite of giving trading permission.

After receiving the mail we immediately approach the further Listing Department (BSE) and gave the exchange our written submission on 28<sup>th</sup> November, 2017 but we have still not



received any response from the exchange. We again mailed on 01<sup>st</sup> December 2017 a reminder mail to approve the trading of bonus equity shares having case no. 70366.

As stipulated in Regulation 95 (1) of SEBI (Issue of Capital and Disclosure Requirements) Regulation 2009 that where the issuer is required to seek shareholders' approval for capitalisation of profits or reserves for making the bonus issue, the bonus issue shall be implemented within two months from the date of the meeting of its board of directors wherein the decision to announce the bonus issue was taken subject to shareholders' approval. **In this connection we are submitting to you as per said regulation that the action is required to be taken within two months of holding of the general meeting at which the shareholders accorded their approval to the issue of bonus shares on 29<sup>th</sup> September, 2017 at the time of the Annual General Meeting. Thus the two months time period expires on 29<sup>th</sup> November, 2017.**

We worked on the Issue and allotment of bonus shares on bonafide intention not any malafide intention. We have done all the compliances of Companies Act 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015, SEBI (Issue of Capital and Disclosure Requirements) Regulation 2009 , and also as per the requirements of BSE, NSDL and CDSL within the time frame till 29<sup>th</sup> November, 2017 from the date of Annual General Meeting.

So, we are requested to you that kindly waive off the Fine/Penalty imposed by you and oblige us as we implement Bonus Issue on time and there is no delay from our side. This delay of trading approval of bonus equity shares by the exchange shall be cause loss to the company. It should be on the part of the Bombay Stock Exchange that in spite of the providing all the relevant documents by us as required by the exchange for trading approval has been submitted. Since we are once again with folded hands requesting to you for the benefit of 6700 shareholders to immediately provide the trading permission of the bonus shares of the company.

SEBI made all the regulations for the protection of interest of the investors not for the destroying the interest of the investors but the Bombay stock exchange doing by not providing the trading approval and imposing penalty on the company destroying the interest of the investors/shareholders of our company as against the regulations of SEBI because in both case by not providing trading permission or imposing the penalty that will **cause loss to the company and ultimately to the investors.**

**Further we would like place before you Regulation 113 of SEBI (Issue of Capital and Disclosure Requirements) Regulation 2009, that stipulates:-**

- (1) The Board may, in the interest of investors or for the development of the securities market, relax the strict enforcement of any requirement of these regulations, if the Board is satisfied that:
  - (a) the requirement is procedural in nature; or
  - (b) any disclosure requirement is not relevant for a particular class of industry or issuer; or
  - (c) the non-compliance was caused due to factors beyond the control of the issuer.

Based on the submissions made by us as elaborated above, we would request you to kindly provide us the trading approval immediately for the interest of the shareholders. And also humbly requesting you to take a lenient view in the matter given the above facts and reconsider your decision to impose penalty on the company.

We would like to assure Bombay Stock Exchange that it has always been an endeavor to comply with the applicable regulations both in letter and spirit.

Thanking You,  
Yours Faithfully

For Bampsl Securities Limited



Bhasham Kumar Gupta  
(Managing Director)

We would like to draw your kind attention that we have submitted the application for trading approval of Bampsl equity shares having value ₹10,00,00,000/- on 24.11.2017 as per the Listing Schedule and comply all the provisions and regulations as per the Listing Obligations and Disclosures Requirements (LODR) 2015 and SEBI (LODR) (Capital and Disclosure) Regulations, 2015 but trading approval has not been granted and any query was raised.

We are a listed company under the Companies Act, 2013 and SEBI (LODR) (Capital and Disclosure) Regulations, 2015. We have always been in compliance with the provisions and regulations as per the Listing Obligations and Disclosures Requirements (LODR) 2015 and SEBI (LODR) (Capital and Disclosure) Regulations, 2015. We have always been in compliance with the provisions and regulations as per the Listing Obligations and Disclosures Requirements (LODR) 2015 and SEBI (LODR) (Capital and Disclosure) Regulations, 2015.

Further, it is requested that you kindly take the necessary steps to grant trading approval for the shares of the company as per the Listing Schedule and comply all the provisions and regulations as per the Listing Obligations and Disclosures Requirements (LODR) 2015 and SEBI (LODR) (Capital and Disclosure) Regulations, 2015.

The Board of Directors of the company has approved the application for trading approval of the shares of the company as per the Listing Schedule and comply all the provisions and regulations as per the Listing Obligations and Disclosures Requirements (LODR) 2015 and SEBI (LODR) (Capital and Disclosure) Regulations, 2015.



DCS/AMAL/AJ/BN-IP/954/2017-18

October 17, 2017

The Company Secretary  
**BAMPSL SECURITIES LTD.**  
100-A, Cycle Market, Jhandewalan Extn,  
New Delhi, Delhi-110055

Dear Sir/Madam,

Re: Application of proposed Bonus Equity Shares under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

We acknowledge receipt of your application regarding in-principle approval for issue and allotment of proposed Bonus equity shares to the shareholders in terms of Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015. In this regard, the Exchange is pleased to grant in-principle approval for issue and proposed allotment of not exceeding 4439369 Bonus equity shares of Rs. 10/- each in the ratio of 3 (Three) new equity share for every 20 (Twenty) existing equity shares held in the Company subject to the company fulfilling the following conditions:

1. Submission of listing application form for the new securities to be allotted and documents as per Format available on the website of BSE Ltd. under following link <http://www.bseindia.com/static/about/downloads.aspx?expandable=2>
2. Payment of Additional listing fees on the enhanced capital, if applicable.
3. Receipt of statutory and other approvals and compliance with guidelines issued by the statutory authorities including SEBI, RBI, MCA etc.
4. Compliance with any change in the guidelines, regulations directions of the Exchange or any statutory authorities, documentary requirements from time to time.
5. Compliance with all conditions of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 as on date of listing.
6. Compliance with the Companies Act, 2013 and other applicable laws.

The Exchange reserves its right to withdraw its in-principle approval at any later stage if the information submitted to the Exchange is found to be incomplete/incorrect/misleading/false or for any contravention of Rules, Bye-laws and Regulations of the Exchange.

This approval is valid up to the time specified in 95(1) of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009.

Kindly note that the Exchange will issue approval for listing subject to the compliances as stated above.

Yours faithfully,

  
Nitin Pujari  
Sr. Manager

## MINISTRY OF CORPORATE AFFAIRS

## e-CHALLAN FOR PAYING LATER

ONLY FOR PAY LATER PAYMENT. NOT FOR PAYMENT AT BRANCH  
COUNTER

SRN : G60530276

Expiry Date : 15/11/2017

SRN date : 08/11/2017

## By Whom tendered

Name : MANOJ K MANDAL  
Address : A-5/30, Basement  
Paschim Vihar Behind OBC  
New Delhi, Delhi  
India - 110063

## Entity on whose behalf money is paid

CIN: L65100DL1995PLC065028  
Name : BAMPLS SECURITIES LIMITED  
Address : 100-A CYCLE MARKET  
JHANDEWALAN EXT  
NEW DELHI, Delhi  
India - 110055

## Full Particulars of Remittance

Service Type: eFiling

Service Description	Type of Fee	Amount(Rs.)
Fee For Form PAS-3	Normal	600.00
<b>Total</b>		<b>600.00</b>

Head of Account: 1475001050000

Accounts Officer by whom adjustable : Pay &amp; Accounts Officer, Ministry of Corporate Affairs, New Delhi

Rupees(In words): Six Hundred Only



DCS/AMAL/AJ/BN-IP/978/2017-18

November 13, 2017

The Company Secretary  
**Bampsl securities Ltd.**  
100-A, Cycle Market, Jhandewalan Extn,  
New Delhi, Delhi-110055

Dear Sir/Madam,

**Re: Listing of 4439369 Bonus Equity Shares of Rs. 10/- each.**

We acknowledge receipt of company letter together with the Listing Application for listing of 4439369 Equity shares and would advise that the Exchange is pleased to grant In-principle approval for the listing of 4439369 Bonus Equity shares to be dealt on this Exchange.

Further, trading in the aforesaid securities of your Company will be permitted after the company submits the following:

- c) Letter/s issued by the National Securities Depository Ltd., and /or Central Depository Services (India) Ltd., confirming the credit of the above mentioned shares in the beneficiary owners account as well as the dispatch confirmation from Registrars for Physical share certificates.
- d) Certified true copies of listing approvals received from National Stock Exchange (if applicable).

You are requested to comply with the above requirements to enable us to permit trading at the earliest.

Further, all critical price sensitive information and other submissions to be provided by the company pursuant to the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 may please filed through listing center. For details please refer to our notice no. 20130208-6 dated 08 Feb 2013 and Notice no. 20130729-25 dated 29 July 2013 available on our website.

Yours faithfully,

  
Nitin Pujari  
Sr Manager