

BAMPSL SECURITIES LIMITED

Regd. Off.: 100-A, Cycle Market, Jhandewalan Extn., New Delhi-110055

Date: - 28.11.2017

Ref. No.:	CIN: L65100DL1995PLC065028	
		Date :

To,
General Manager
Department of Corporate Services
BSE Limited
P.J. Towers, Dalal Street
Mumbai-400001

Subject: - Regarding Waive off Fine

Ref: - Fine for Non Compliance of Regulation 95(1) of the SEBI (Issue of Capital and Disclosure Requirements) Regulation 2009

Dear Sir,

This is with reference to your mail dated 27.11.2017 wherein you have mentioned about Non-Compliance by our Company with the SEBI (Issue of Capital and Disclosure Requirements) Regulation 2009 and consequently imposed fine on us. In this connection we would like to place before you the facts detailed hereinafter for your consideration. On perusal of the same, you would appreciate company's position in ensuring compliance with different regulation of SEBI governing us and agree with our submission that there has been no non-compliance on our part:-

- The Board of Directors decided to announce Issue of Bonus Shares in its Board Meeting conducted on 22nd August 2017 subject to approval of shareholders in the Annual general Meeting.
- 2. The Board fixed the Record Date for Annual General Meeting on 22nd September, 2017 and the Annual General Meeting was held on 29th September, 2017 for Shareholders Approval.

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 12th October 2017.



- 3. The company was accorded "In-Principle Approval" from Bombay Stock Exchange on 17th October 2017 indicating therein 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.
- 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 18th October, 2017, fixing 27th 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 entirely the company fixed the Record date for the purpose of issue of Bonus Shares as 27th October, 2017 having due regard to the fact that the last record date was 22nd September, 2017.

- The company then made application to Bombay Stock Exchange for listing of Bonus Equity Shares on 06th November 2017 and the same was obtained on 13th November, 2017.
- After obtaining Listing Approval from Bombay Stock Exchange, the company got the NSDL/CDSL Debit/Credit Certificates on 20th November 2017 and 24th November 2017.
- 7. The Company has made an application to Bombay Stock Exchange for trading of Bonus Shares on 24th November 2017.

Based on the submissions made by us as elaborated above, we would request you to kindly 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

Bhisham Kumar Gupta (Managing Director)