



CIN No.: L45500DL2016PLC299428

DCL/SEC/20-21/  
29th July, 2020

**BY COURIER/EMAIL**

To  
The Secretary  
BSE Limited  
Phiroze Jeejeebhoy Tower,  
27th floor, Dalal Street,  
MUMBAI - 400001

Dear Sir,

**Sub: Annual Secretarial Compliance Report(Regulation 24A)**

Please find enclosed herewith the Annual Secretarial Compliance Report of Blueblood Ventures Limited as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements)Regulations, 2015.

This is for your information and records.

Thanking you,

Yours faithfully,

For **Devoted Construction Limited**

  
**Suresh Bohra**

**Director**

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## **DEVOTED CONSTRUCTION LIMITED**

Regd. Office: Property No.6, DSIIDC Shed -1, Okhla Phase-2, Second Floor, New Delhi-110020  
Corp. Office: M-55, Top Floor, M Block Market, Greater Kailash - II, New Delhi-110048  
Ph.: 011-40319999, Fax : 011-40319931, E-Mail :info@devotedconstruction.com Website: www.devotedconstruction.com

**Secretarial compliance report  
FOR THE FINANCIAL YEAR ENDED 31.03.2020**

To,  
Devoted Construction Limited  
New Delhi

We MZ & Associates, a firm of Company Secretaries, having our office at 3/31, West Patel Nagar, New Delhi 110008 have examined:

- a) all the documents and records made available to us and explanation provided by Devoted Construction Limited (hereinafter referred to as "the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) other document/ filing, as may be relevant, which has been relied upon to make this certification

for the year ended 31<sup>st</sup> March, 2020 ("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, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the Company during the Financial Year 2019-20)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the Company during the Financial Year 2019-20)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the Financial Year 2019-20)**
- g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the Company during the Financial Year 2019-20)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) The Employees State Insurance Act, 1948, Employees Provident Fund and Miscellaneous Provisions Act, 1952, Employers Liability Act, 1938, Environment Protection Act, 1986 and other environmental laws, Air (Prevention and Control of pollution) Act, 1981, Factories Act, 1948, Industrial Dispute Act, 1947, Payment of Wages Act, 1936 and other applicable

**MZ & ASSOCIATES, Company Secretaries**

Peer Review Firm: 757/2020, Address: 3/31/ West Patel Nagar, New Delhi 110008  
Telephone No: - +91 11 4341 1003-04, Website: [www.mycompliances.com](http://www.mycompliances.com)  
Email: [associates.mza@gmail.com](mailto:associates.mza@gmail.com)



labour laws and based on the above examination, We hereby report that, during the Review Period: **(Not applicable to the Company during the Financial Year 2019-20)**

Sr. No	Compliance Requirement	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Pursuant to Regulation 33 of the SEBI (LODR) Regulations, 2015 where the companies are required to furnish Quarterly Financial Result within 45 days of the end of that quarter to the Exchange & for the last quarter, the company has to submit, within 60 days from the end of the financial year, the Audited Financial Results for entire financial year along with audited financial results in respects of the last quarter (balancing figure) along with Auditors Report.	Due date of Board Meeting is 14 <sup>th</sup> Nov 2019 but the meeting was held on 28 <sup>th</sup> Nov 2019. There is non-compliance of delay in board meeting for the 14 days.	Due to non-compliance of Regulation 33 of the SEBI (LODR) Regulations, 2015 where the companies are required to furnish Quarterly Financial Result within 45 days of the end of that quarter to the Exchange & for the last quarter, the company has to submit, within 60 days from the end of the financial year. As per letter issued by BSE (Letter No. LIST/COMP/542002/Reg.33-Sep-19/239/2019-20 dated December 02, 2019) the penalty of Rs. 5,000/- per day for a period of 14 days is still unpaid.

- e) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.
- f) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken	Observations
1	BSE	Non-submission of the financial results within the period prescribed under the Regulation 33 of SEBI (LODR) Regulations, 2015	Rs 5,000/- per day for a period of 14 days of non-compliance i.e. Rs 70,000/-	Pursuant to Regulation 33 of the SEBI (LODR) Regulations, 2015 where the companies are required to furnish Quarterly Financial Result within 45 days of the end of that quarter to the Exchange & for the last quarter, the company has to submit, within 60 days from the end of the financial year, the Audited Financial Results for entire financial year along with audited financial results in respects of the last quarter

**MIZ & ASSOCIATES, Company Secretaries**

Peer Review Firm: 757/2020, Address: 3/31/ West Patel Nagar, New Delhi 110015  
 Telephone No: +91 11 4341 1003-04, Website: [www.mycompliances.com](http://www.mycompliances.com)  
 Email: [associates.mza@gmail.com](mailto:associates.mza@gmail.com)



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				(balancing figure) along with Auditors Report.
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g) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the	Observations made in the	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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Independent Directors

appointed the Independent Director as required under the regulation 27 of the LODR

appointed the Independent Director and made the compliances' good

Independent Director and as on the date of the report all compliances were made good.

Financial Officer and Managing Director

fails to appoint the CFO and MD during the year under audit and has not complied with the regulation 27 of the LODR

appointed the CFO and made the compliances' good

appointed the CFO and as on the date of the report all compliances were made good.

Place: New Delhi  
Date: 29<sup>th</sup> July, 2020

For MZ & Associates

Membership No: FCS 9184  
CP: 13875  
UDIN: F009184B000521377

MZ & ASSOCIATES, *Company Secretaries*

Peer Review Firm: 757/2020, Address: 3/31/ West

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