

Ref.: BIL/SE/2022-23/50

**Date: 13<sup>th</sup> January, 2023**

**BHARTIYA INTERNATIONAL  
LIMITED**  
38, Sector 44  
Gurgaon 122 002  
New Delhi Capital Region  
India  
T +91 124 488 8555  
F +91 124 488 8500  
E bhartiya@bhartiya.com

**CIN L74899TN1987PLC111744**

[www.bhartiya.com](http://www.bhartiya.com)

The Vice-President, Listing Department, National Stock Exchange of India Ltd. Exchange Plaza, 5 <sup>th</sup> Floor, Plot No. - C/1, G Block, Bandra - Kurla Complex, Bandra (E), Mumbai - 400051 Fax - 022-26598237/38 <b>NSE Symbol: BIL/EQ</b>	The General Manager, Listing Department, BSE Limited, Floor -25, Phiroze Jeejeebhoy Tower, Dalal Street, Mumbai- 400001 Fax - 022-22722037/39/41/61 <b>Scrip Code: 526666</b>
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Dear Sir/Madam,

Pursuant to the requirement under the Regulation 13(3) of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, Investor Grievance Report for the Quarter ended 31<sup>st</sup> December, 2022 is as under:

<b>Investor Grievance pending at the beginning of the Quarter - 1<sup>st</sup> October, 2022</b>	Nil
<b>Investor Grievance received during the Quarter</b>	1
<b>Investor Grievance disposed of during the Quarter</b>	0
<b>Investor Grievance unresolved at the end of the Quarter- 31<sup>st</sup> December, 2022</b>	1

This is for your information and record please.

**Thanking you,**

**Yours sincerely,  
For Bhartiya International Limited**

**Yogesh Kumar Gautam  
(Company Secretary cum Compliance Officer)**

**Complaints Status as on: 09/01/2023**

<b>Total Complaints Received</b>	6
<b>Total Resolved Complaints</b>	6
<b>Total Pending Complaints</b>	0
<b>Total Complaints Withdrawn</b>	0
<b>ATR/REPLY Sent and Pending With SEBI</b>	0
<b>Review(s) received</b>	<a href="#">Click Here</a>
<b>Direct complaint(s) received from investor</b>	<a href="#">Click Here</a>
<b>New Complaints from SEBI (For Assessment)</b>	--
Clarification Sought By SEBI/Higher Organization	--
Action Taken Report Received	--
Action Taken Report Sent	--
Pending Complaints(Within Our Office)	--
Pending Complaints(With Investor)	--
Pending Complaints(With Subordinate Organisations)	--
Pending Complaints(With Subordinate Organisations - Atr not Received)	--
Reminder/Clarification received from investor/SEBI	--
Clarification sought from subordinate organisation	--



## MAS SERVICES LIMITED

Regd. Office : T-34 IIND FLOOR OKHLA INDUSTRIAL AREA  
PHASE-II NEW DELHI 110020  
PHONE:- 011-26387281-83 FAX:- 011 - 26387384  
E-mail:- info@masserv.com  
CIN:-U74899DL1973PLC006950

To,

DATE: - January 5, 2023

**BHARTIYA INTERNATIONAL LIMITED**

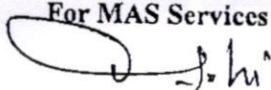
Dear Sir/Madam,

We hereby confirm the following status of the Investor Grievance during the period from 01-Oct-2022 to 31-Dec-2022 as following:-

Sr.No.	Nature of Correspondence	Pending at the beginning of qtr.	Recd during the qtr.	Disposed of during the qtr	Unresolved at the end of qtr
1.	Non receipt of Refund allotment	0	0	0	0
2	Non receipt of Div on shares	0	0	0	0
3	Non receipt of Share Cert. after trf/trm/spt etc.	0	0	0	0
4	Non receipt of Intrest on deb.	0	0	0	0
5	Non receipt of Sticker/Annual report	0	0	0	0
6	SEBI complaint	0	0	0	0
7	Complaint recd from NSDL/ CDSL	0	0	0	0
8	Complaint recd from Stock Exchange	0	0	0	0
9.	Complaint recd MCA/ROC	0	0	0	0
	<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Thanking you,

Yours Trully,  
For MAS Services Limited

  
O.P. JOSHI

## Shares

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**From:** Yogesh Gautam  
**Sent:** 20 January 2023 15:13  
**To:** Shares  
**Subject:** FW: Complaint in the matter of Warrants issued by Bhartiya International Ltd.  
**Importance:** High

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**From:** ACHAL SINGH <achals@sebi.gov.in>  
**Sent:** 19 December 2022 10:31  
**To:** Yogesh Gautam <yogesh.gautam@bhartiya.com>  
**Cc:** Raj Chawla <raj.chawla@bhartiya.com>  
**Subject:** Complaint in the matter of Warrants issued by Bhartiya International Ltd.  
**Importance:** High

Dear Sir,

We note from Bhartiya International Ltd.'s letter dated April 14, 2017 to stock exchanges that warrants were issued to following entities;-

<b>Name of allottee</b>	<b>No. of warrants allotted</b>	<b>Issue Price in INR</b>	<b>Upfront payment at the time of allotment of warrants (25%) in INR</b>
Axis Training Institute P. Ltd.	1,50,000	521	1,95,37,500
Shankar Somani	75,000	521	97,68,750
Shailza Bansal	75,000	521	97,68,750

In respect of these allotments, please provide the following details:-

(a) Your company's had made disclosure to stock exchanges dated February 15 2017 mentioning the name of above allottees for warrants at a price after approval from shareholders to be obtained by way of postal ballot. This implies that you had already shortlisted these investors at the time of letter to tock exchange. In this regard, please provide:-

- (i) Name of person(s) (with contact details) who introduced these investors to your company or director of your company?
- (ii) Please provide details of your company's/ director's correspondences (including emails) with person(s) referred at (i) that convinced you to inform stock exchanges of their names and later also seek approval from shareholders on March 22, 2017.

- (iii) Has your company paid any introduction fees or commission or brokerage to person referred at (i) above or any other person in respect of warrants allotted to above investors? If yes, details be provided.
- (b) Details of your company's or director's correspondences with these investors from start till date.
- (c) Details of funds received from these investors by your company.
- (d) Details of funds returned back by your company to these investors by your company.
- (e) Copy of ledger account of these investors in your book of accounts from 2016-17 onwards.

These details be provided latest by **December 22, 2022**.

Thanks & Regards,

Achal Singh  
General Manager  
SEBI-CFD  
SEC-1