प्रति To,

नेशनल स्टॉक एक्सचेंज ऑफ इंडिया लिमिटेड National Stock Exchange of India Ltd. एक्सचेंज प्लाज़ा, प्लॉट नं. सी/1, जी ब्लॉक Exchange Plaza, Plot No. C/1, G Block, बांद्रा-कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व) Bandra-Kurla Complex, Bandra (E) मुंबई/Mumbai – 400 051

# सं.No. 17565/6/SE/NSEC/SEC दिनांक / Date: 20<sup>th</sup> April, 2022

महोदय / महोदया, Dear Sir/Madam,



# भारत इलेक्ट्रॉनिक्स लिमिटेड

(भारत सरकार का उद्यम, रक्षा मंत्रालय) पंजीकृत कार्यालय : आउटर रिंग रोड, नागवारा, बेंगलूर - 560 045, भारत

# Bharat Electronics Limited

(Govt. of India Enterprise, Ministry of Defence) Registered Office : Outer Ring Road, Nagavara, Bangalore - 560 045, INDIA. CIN : L32309KA1954GOI000787 टेलीफेक्स/Telefax : +91 (80) 25039266 ई-मेल/E-mail : secretary@bel.co.in वेब/Web : www.bel-india.com

# विषय : दिनांक 31.03.2022 को समाप्त तिमाही और वर्ष के लिए कॉर्पोरेट गवर्नेंस की रिपोर्ट। Sub: Corporate Governance Report for Quarter and Year Ended 31.03.2022.

सेबी (सूचीकरण की बाध्यताएं एवं प्रकटीकरण की अपेक्षाएं) विनियम, 2015 के विनियम 27(2) के अनुक्रम में, कृपया दिनांक 31.03.2022 को समाप्त तिमाही और वर्ष के लिए कार्पोरेट गवर्नेंस की रिपोर्ट संलग्न पाएं ।

Pursuant to Regulation 27 (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Corporate Governance Report for quarter and year ended 31.03.2022.

सूचना व अभिलेख हेतु। This is for your information and record.

सधन्यवाद / Thanking you,

भवदीय Yours faithfully,

कृते भारत इलेक्ट्रॉनिक्स लिमिटेड For Bharat Electronics Limited

एस श्रीनिवास S Sreenivas कंपनी सचिव Company Secretary

संलग्न- यथा उपरोक्त । Encls: As stated above.

# **COMPLIANCE REPORT ON CORPORATE GOVERNANCE**

[Regulation 27(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

# 1. Name of the Company: Bharat Electronics Limited. 2. Quarter and Year Ended: 31<sup>st</sup> March, 2022.

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I. Cor	mposition of Boa	ird of Directors	\$									
Title (Mr. / Ms/ Mrs)	Name of the Director	PAN & DIN	Category (Chairperson /Executive/ Non- Executive/ Independent /Nominee)	Initial Date of Appointm -ent	Date of Re- appointm -ent	Date of Cessation	Tenure <sup>#</sup> (in Months)	Birth	No of Directo -rship in listed entitie- s inclu- ding this listed entity ( in referen -ce to reg. 17A (1)	No of Indepen -dent Director- ship in listed entities includin- g this listed entity (in referenc -e to Proviso to reg. 17A (1)	Number of Membersh -ips in Audit/ Stakehol- ders Relation- ship Committ- ee(s) including this listed entity * (Refer reg. 26(1) of Listing Regulati- ons)	No of post of Chairperson in Audit/ Stakeholders Relations-hip Committee held in listed entities including this listed entity * (Refer reg. 26(1) of Listing Regulations)
Mrs	Anandi Ramalingam	ACYPR4590E & 07616518	Executive Director	16-09-2016	30-09-2020	NA	NA	17-08-1962	01	Nil	02	Nil
Mr.	Vinay Kumar Katyal	AEGPK1812A & 08281078	Executive Director	27-11-2018	28-09-2021	NA	NA	26-07-1963	01	Nil	01	Nil
Mr.	Dinesh Kumar Batra	ACSPB7936L & 08773363	Executive Director	01-08-2020	NA	NA	NA	11-10-1962	01	Nil	03	02
Mr.	Rajasekhar Venkata Matukumalli	ACDPM2148J & 08850171	Executive Director	01-09-2020	NA	NA	NA	19-08-1962	01	Nil	02	Nil

		T	Tarrent									
Ms.	Manjula Jillellamudi	ACKPJ0451G & 07684528	Non-Executive -Nominee Director	23-04-2018	NA	NA	NA	26-04-1962	01	Nil	Nil	Nil
Mr.	Anurag Bajpai	AEMPB7121B & 08948155	Non-Executive -Nominee Director	29-10-2020	NA	NA	NA	13-07-1970	02	Nil	Nil	Nil
Mr.	Sunil Kumar Kohli	AAAPK1892N & 05321549	Independent Director	18-07-2019	NA	NA	32 Months 14 days	17-08-1958	01	01	02	02
Dr.	Parthasarathi P V	AKEPP2812K & 06400408	Independent Director	28-12-2021	NA	NA	3 Months 4 days	30-08-1970	01	01	Nil	Nil
Mr.	Mansukhbhai Shamjibhai Khachariya	ALVPK4137E & 01423119	Independent Director	28-12-2021	NA	NA	3 Months 4 days	01-02-1960	01	01	01	Nil
Dr.	Santhoshkumar N	AIKPS7613K & 09451052	Independent Director	28-12-2021	NA	NA	3 Months 4 days	03-07-1963	01	01	Nil	Nil
Mr.	Prafulla Kumar Choudhury	AAJPC7881Q & 00871919	Independent Director	28-12-2021	NA	NA	3 Months 4 days	23-07-1957	01	01	01	Nil
Dr.	Shiv Nath Yadav	AATPY6015A & 09450917	Independent Director	28-12-2021	NA	NA	3 Months 4 days	11-07-1957	01	01	01	Nil
Mr.	Gokulan Bangakandy	AQUPB2431N & 09473378	Independent Director	20-01-2022	NA	NA	2 Months 12 days	23-05-1962	01	01	Nil	Nil
Mrs.	Shyama Singh	AMZPK2946E & 09495164	Independent Director	07-02-2022	NA	NA	1 Months 25 days	15-10-1966	01	01	Nil	Nil
Mrs.	Shyama Singh	그는 이 이 것이 같은 것이 같은 것이 같은 것이 같은 것이 없다. 것이 같은 것이 같은 것이 같이 없다.	[1] Constant S. Manager Stream Action 19	07-02-2022	NA	NA		15-10-1966	01	01	Nil	

# to be filled only for Independent Director. Tenure would mean total period from which Independent director is serving on Board of directors of the listed entity in continuity without any cooling off period.
 \* including Public Limited Companies.

Whether Regular chairperson appointed: Yes.

Whether Chairperson is related to Managing Director or CEO: The Chairperson and Managing Director is same person.

# II. Composition of Committees:

Name of the Committees	Whether Regular chairperson appointed	Name of Committee Members	Category (Chairperson/Executive/ Non-executive /independent/ Nominee)	Date of Appointment	Date of Cessation
	Yes.	Mr. Sunil Kumar Kohli, Chairman	Non-Executive -Independent Director	31-12-2019	Not Applicable
1. Audit Committee	Mr. Sunil Kumar Kohli	Mr. Prafulla Kumar Choudhury, Member	Non-Executive -Independent Director	31-12-2021	Not Applicable
	(w.e.f 20.10.2020)	Dr. Shiv Nath Yadav, Member	Non-Executive -Independent Director	31-12-2021	Not Applicable
		Mr. Sunil Kumar Kohli, Chairman	Non-Executive -Independent Director	07-01-2021	Not Applicable
2 Nomination 6	Nee	Ms. Manjula Jillellamudi, Member	Non-Executive -Nominee Director	07-01-2021	06-01-2022
2. Nomination & Remuneration	Yes. Mr. Sunil Kumar Kohli	Mr. Anurag Bajpai, Member	Non-Executive -Nominee Director	07-01-2021	06-01-2022
Committee	(w.e.f 07.01.2021)	Mrs. Anandi Ramalingam, Member	Executive Director	07-07-2021	Not Applicable
		Dr. Parthasarathi P V	Non-Executive -Independent Director	06-01-2022	Not Applicable
		Dr. Santhoshkumar N	Non-Executive -Independent Director	06-01-2022	Not Applicable
	Yes. Mr. Sunil Kumar Kohli	Mr. Sunil Kumar Kohli, Chairman	Non-Executive -Independent Director	31-03-2021	Not Applicable
3. Stakeholders Relationship		Mrs. Anandi Ramalingam, Member [As Director (HR) - Additional Charge]	Executive Director	01-12-2021	Not Applicable
Committee	(w.e.f 31.12.2021)	Mr. Dinesh Kumar Batra, Member	Executive Director	01-08-2020	Not Applicable
		Mr. Khachariya Mansukhbhai Shamjibhai, Member	Non-Executive -Independent Director	31-12-2021	Not Applicable
		Mrs. Anandi Ramalingam, Chairperson	Executive Director	16-09-2016	Not Applicable
	Yes.	Mr. Vinay Kumar Katyal, Member	Executive Director	01-02-2019	Not Applicable
4. Risk Management	Mrs. Anandi	Mr. Dinesh Kumar Batra, Member	Executive Director	01-08-2020	Not Applicable
Committee	Ramalingam	Mr. Rajasekhar Venkata Matukumalli	Executive Director	22-06-2021	Not Applicable
	(w.e.f 31-12-2019)	Mr. Sunil Kumar Kohli, Member	Non-Executive -Independent Director	22-06-2021	Not Applicable
<i>x</i>		Mrs. Hemalatha K, Member	ED (Strategic Planning)	01-05-2017	31-01-2022

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Date(s) of Meeting (if any) in the Previous Quarter	Date(s) of Meeting (if any) in the Relevant Quarter	Whether Requirement of Quorum Met*	Number of Directors Present*	Number of Independent Directors Present*	Maximum Gap Between any Two Consecutive Meetings (in number of days)
29-10-2021	28-01-2022 17-03-2022	Yes Yes	12 11	07 08	90 Days
* To be filled in only for the curre	ent quarter meetings.				
IV. Meeting of Committees					
i) Audit Committee:					
Date(s) of Meeting of the	Whether Requirement	Number of	Number of	Date(s) of Meeting of the	Maximum Gap Between any
Committee in the Relevant	of Quorum Met	<b>Directors Present*</b>	Independent	Committee	Two Consecutive Meetings in
Quarter	(Details)*		<b>Directors Present*</b>	in the Previous Quarter	Number of days*
19-01-2022	Yes	03	03		
27-01-2022	Yes	03	03	28-10-2021	82 Days
25-03-2022	Yes	03	03		~
i) Nomination and Remunera	ation Committee:				
Date(s) of Meeting of the	Whether requirement of	Number of	Number of	Date(s) of Meeting of the	Maximum Gap Between any
Committee in the Relevant	Quorum met (details)*	Directors present*	Independent	Committee	Two Consecutive Meetings i
Quarter			<b>Directors Present*</b>	in the Previous Quarter	Number of days*
05-01-2022	Yes	02	01	29-10-2021	Not Applicable
20 & 21 -01-2022	Yes	04	03	29-10-2021	Not Applicable
ii) Stakeholders Relationship	o Committee:				
Date(s) of Meeting of the	Whether requirement of	Number of	Number of	Date(s) of Meeting of the	Maximum Gap Between any
Committee in the Relevant	Quorum met (details)*	Directors present*	Independent	Committee	Two Consecutive Meetings i
Quarter			<b>Directors Present*</b>	in the Previous Quarter	Number of days*
28-01-2022	Yes	04	02	-	Not Applicable
iv) Risk Management Commit	ttee:				
Date(s) of Meeting of the Committee in the Relevant Quarter	Whether requirement of Quorum met (details)*	Number of Directors present*	Number of Independent Directors Present*	Date(s) of Meeting of the Committee in the Previous Quarter	Maximum Gap Between any Two Consecutive Meetings i Number of days*
	Yes			and the the the the second ter	indition of days

V. Related Party Transactions:

Compliance status
Yes
Not Applicable
Yes

#### VI. Affirmations:

1. The composition of Board of Directors is in terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. The composition of the following committees is in terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

- a. Audit Committee
- b. Nomination & Remuneration Committee<sup>#</sup>.
- c. Stakeholders Relationship Committee
- d. Risk Management Committee (applicable to the top 1000 listed entities)

3. The Committee(s) Members has been made aware of their powers, role and responsibilities as specified in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

4. The meetings of the Board of Directors and the above committees have been conducted in the manner as specified in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

5. This report and/or the report submitted in the previous quarter has been placed before Board of Directors. Any comments/observations/advice of the Board of Directors may be mentioned here. – The Corporate Governance Report of the previous quarter ended 31-12-2021 was placed before the Board of Directors in their meeting held on 28-01-2022 and the Board noted the same. The Corporate Governance Report of the current quarter and year ended 31.03.2022 will be placed in the ensuing meeting of Board of Directors.

# on 31/12/2021, Nomination & Remuneration Committee has been reconstituted comprising of 3 Independent Directors and 1 Executive Director w.e.f 06/01/2022. As new Independent Directors were appointed on 28/12/2021, due to statutory compliances, Nomination & Remuneration Committee was reconstituted in line with Regulation-19 of SEBI (LODR) Regulations, 2015 w.e.f 06/01/2022.

For Bharat Electronics Limited

S Sreenivas **Company Secretary** 

Place: Bengaluru Date: 20<sup>th</sup> April, 2022.

Item	Compliance Status (Yes/No/NA)	If Yes provide link to website. If No / NA provide reasons
As per regulation 46(2) of the LODR:		
a) Details of business	Yes	https://www.bel-india.in/
b) Terms and conditions of appointment of Independent Directors	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=527&LId=1&link=527
c) Composition of various committee of Board of Directors	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=527&LId=1&link=527
d) Code of conduct of Board of Directors and Senior Management Personnel	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=527&LId=1&link=527
e) Details of establishment of Vigil Mechanism/Whistle Blower Policy	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=527&LId=1&link=527
f) Criteria of making payments to Non-executive Directors	NA	Not Applicable
g) Policy on dealing with Related Party Transactions	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=527&LId=1&link=527
h) Policy on determining "material" subsidiaries	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=527&LId=1&link=527
<ul> <li>i) Details of familiarization programmes imparted to Independent Directors</li> </ul>	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=2505&LId=1&link=2505
j) Email address for grievance redressal and other relevant details	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=2505&LId=1&link=2505
<ul> <li>k) Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances</li> </ul>	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=2505&LId=1&link=2505
I) Financial results	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=429&LId=1&link=429
m) Shareholding pattern	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=433&LId=1&link=433
n) Details of agreement entered into with the media companies and/or their associates	NA	Not Applicable
<ul> <li>o) Schedule of analyst or institutional investor meet and presentations made by the listed entity to analysts or institutional investors simultaneously with submission to stock exchange</li> </ul>	Yes	https://www.bel- india.in/ContentPage.aspx?MId=17&CId=423&LId=1&link=423
p) New name and the old name of the listed entity	NA	Not Applicable

# Format to be submitted by listed entity at the end of the financial year (for the whole of financial year)

has

q) Advertisements as per regulation 47 (1)	Yes	https://www.bel-
		india.in/ContentPage.aspx?MId=17&CId=423&LId=1&link=423
r) Credit rating or revision in credit rating obtained by the entity for all	Yes	https://www.bel-
its outstanding instruments	Tes	india.in/ContentPage.aspx?MId=17&CId=423&LId=1&link=423
s) Separate audited financial statements of each subsidiary of the listed	Vac	https://www.bel-
entity in respect of a relevant financial year	Yes	india.in/ContentPage.aspx?MId=17&CId=427&LId=1&link=427
As per other regulations of the LODR:		
a) Whether company has provided information under separate section	Yes	
on its website as per Regulation 46(2)		www.bel-india.co.in/investors
b) Materiality Policy as per Regulation 30	Yes	https://www.bel-
b) Materiality Policy as per Regulation 50		india.in/ContentPage.aspx?MId=17&CId=527&LId=1&link=527
a) Dividend Distribution policy on new Desculation 424 (as applicable)	Yes	https://www.bel-
c) Dividend Distribution policy as per Regulation 43A (as applicable)		india.in/ContentPage.aspx?MId=17&CId=527&LId=1&link=527
It is certified that these contents on the website of the listed entity are corr	ect.	

II Annual Affirmation			
Particulars	Regulation Number	Compliance Status (Yes/No/NA)	
Independent Director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility'	16(1)(b) & 25(6)	16(1)(b) - Yes 25(6) - No*	
Board composition	17(1), 17(1A) & 17(1B)	17(1)-No*, 17(1A)-Yes, 17(1B) - NA	
Meeting of Board of Directors	17(2)	Yes	
Quorum of Board meeting	17(2A)	Yes	
Review of Compliance Reports	17(3)	Yes	
Plans for orderly succession for appointments	17(4)	Yes	
Code of Conduct	17(5)	Yes	
Fees/compensation	17(6)	NA	
Minimum information	17(7)	Yes	
Compliance Certificate	17(8)	Yes	
Risk Assessment & Management	17(9)	Yes	
Performance Evaluation of Independent Directors	17(10)	Yes	
Recommendation of Board	17(11)	Yes	
Maximum number of directorship	17A	Yes	
Composition of Audit Committee	18(1)	Yes <sup>#</sup>	
Meeting of Audit Committee	18(2)	Yes	

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Composition of Nomination & Remuneration Committee	19(1) & 19(2)	Yes <sup>@</sup>
Quorum of Nomination and Remuneration Committee meeting	19(2A)	Yes
Meeting of Nomination & Remuneration Committee	19(3A)	Yes
Composition of Stakeholders Relationship committee	20(1), 20(2) and 20(2A)	Yes
Meeting of Stakeholder Relationship Committee	20(3A)	Yes
Composition and role of Risk Management Committee	21(1),(2),(3),(4)	Yes
Meeting of Risk Management Committee	21(3A)	Yes
Vigil Mechanism	22	Yes
Policy for Related Party Transactions	23(1), (1A), (5),(6),(7) & (8)	Yes
Prior or Omnibus approval of Audit Committee for all related party transactions	23(2)(3)	Yes
Approval for material Related Party Transactions	23(4)	NA
Disclosure of Related Party Transactions on consolidated basis	23(9)	Yes
Composition of Board of Directors of unlisted material Subsidiary	24(1)	NA
Other Corporate Governance requirements with respect to subsidiary of listed entity	24(2),(3),(4) (5) & (6)	Yes
Annual Secretarial Compliance Report	24(A)	Yes
Alternate Director to Independent Director	25(1)	Yes
Maximum Tenure	25(2)	Yes
Meeting of Independent Directors	25(3) & (4)	Yes
Familiarization of Independent Directors	25(7)	Yes
Declaration from Independent Director	25(8) & (9)	Yes
Directors and Officers Insurance	25(10)	Yes
Memberships in Committees	26(1)	Yes
Affirmation with compliance to code of conduct from members of Board of Directors and	26(3)	Yes
Senior management personnel		
Disclosure of Shareholding by Non-Executive Directors	26(4)	Yes
Policy with respect to Obligations of Directors and Senior Management	26(2) & 26(5)	Yes

Note

1. In the column "Compliance Status", compliance or non-compliance may be indicated by YES/No/NA. For example, if the Board has been composed in accordance with the requirements of Listing Regulations, "Yes" may be indicated. Similarly, in case the Listed Entity has no related party transactions, the words "N.A" may be indicated.

- 2. If status is "No" details of non-compliance may be given here.
- 3. If the listed entity would like to provide any other information the same may be indicated here.

\*The composition of Board of Directors of BEL has an appropriate mix of Executive Directors represented by Functional Directors including CMD and Non-Executive Directors represented by Government Nominees & Independent Directors. As the Chairman is an Executive Director, Independent Directors

comprise half of the strength of the Board. There were temporary vacancies of Independent Directors (including one Women Independent Director) during the year. The same got filled by appointing five (5) Independent Directors w.e.f 28/12/2021, one (1) Independent Director w.e.f 20/01/2022 and one (1) Women Independent Director w.e.f 07/02/2022. All the vacancies were notified to Government for filling up. BEL being a Govt. Company, all Directors on the Board of BEL are appointed by the Govt. of India and the selection process & appointment, which involves various Ministries and approval by the ACC, takes time and is beyond the control of the Company.

#The composition of the Audit Committee was not in terms of regulation 18(1) of SEBI (LODR) Regulations, 2015 due to non-availability of requisite number of Independent Directors on the Board. The Audit Committee is re-constituted w.e.f 31/12/2021 in terms regulation 18(1) of SEBI (LODR) Regulations, 2015.

@The composition of the Nomination & Remuneration Committee was not in terms of regulation 19(1) of of SEBI (LODR) Regulations, 2015 due to nonavailability of requisite number of Independent Directors on the Board. The Nomination & Remuneration Committee is re-constituted w.e.f 06/01/2022 in terms regulation 19(1) of SEBI (LODR) Regulations, 2015.

#### **III** Affirmations:

The Listed Entity has approved Material Subsidiary Policy and the Corporate Governance requirements with respect to subsidiary of Listed Entity have been complied - Yes.

Place: Bengaluru Date: 20<sup>th</sup> April, 2022

For Bharat Electronics Limited S Sreenivas **Company Secretary** 

# Format to be submitted twice a year, on a half yearly basis by the listed entity at the end of every 6 months of the financial

year

[Regulation 27(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

#### Name of the Company: **Bharat Electronics Limited** Half Year ending on: **31**<sup>st</sup> **March**, **2022**

# I. Disclosure of Loans / guarantees / comfort letters / securities etc. refer note below

(A) Any loan or any other form of debt advanced by the listed entity directly or indirectly to:

Entity	Aggregate amount advanced during six months	Balance outstanding at the end of six months
Promoter or any other entity controlled by them	Not Applicable	Not Applicable
Promoter Group or any other entity controlled by them	Not Applicable	Not Applicable
Directors (including relatives) or any other entity controlled by them	Not Applicable	Not Applicable
KMPs or any other entity controlled by them	Not Applicable	Not Applicable

(B) Any guarantee/ comfort letter (by whatever name called) provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:

Entity	Type (guarantee, comfort letter etc.)	Aggregate amount of issuance during six months	Balance outstanding at the end of six months (taking into account any invocation)
Promoter or any other entity controlled by them	Not Applicable	Not Applicable	Not Applicable
Promoter Group or any other entity controlled by them	Not Applicable	Not Applicable	Not Applicable
Directors (including relatives) or any other entity controlled by them	Not Applicable	Not Applicable	Not Applicable
KMPs or any other entity controlled by them	Not Applicable	Not Applicable	Not Applicable

(C) Any security provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:

Entity	Type of security (cash, shares etc.)	Aggregate value of security provided during six months	Balance outstanding at the end of six months
Promoter or any other entity controlled by them	Not Applicable	Not Applicable	Not Applicable
Promoter Group or any other entity controlled by them	Not Applicable	Not Applicable	Not Applicable
Directors (including relatives) or any other entity controlled by them	Not Applicable	Not Applicable	Not Applicable
KMPs or any other entity controlled by them	Not Applicable	Not Applicable	Not Applicable

## **II. Affirmations:**

All loans (or other form of debt), guarantees, comfort letters (by whatever name called) or securities in connection with any loan(s) (or other form of debt) given directly or indirectly by the listed entity to promoter(s), promoter group, director(s) (including their relatives), key managerial personnel (including their relatives) or any entity controlled by them are in the economic interest of the company.-**Not Applicable**.

For Bharat Electronics Limited S Sreenivas **Company Secretary** 

### Place: Bengaluru Date: 20<sup>th</sup> April, 2022.

#### Note

1. These disclosures shall exclude any loan (or other form of debt), guarantee / comfort letter (by whatever name called) or security provided in connection with any loan or any other form of debt;

a) by a government company to/ for the Government or government company

b) by the listed entity to/for its subsidiary [and joint-venture company] whose accounts are consolidated with the listed entity.

c) by a banking company or an insurance company ; and

d) by the listed entity to its employees or directors as a part of the service conditions

2. If the Listed Entity would like to provide any other information, the same may be indicated as Para D in the above table