

Ref. No.: BCCL: CS: F-Post-Listing: 168

Dated: 29.05.2026

To,
Listing Department,
Bombay Stock Exchange Limited,
Mumbai-400051
Scrip Code 544678

To
Listing Department,
National Stock Exchange of India Limited
Mumbai-400051
Ref: ISIN – INE05XR01022

Sub: - Annual Secretarial Compliance Report of Bharat Coking Coal Limited for the Financial Year ended 31st March, 2026

Dear Sir/Madam,

In terms of Regulation 24A of SEBI (LODR) Regulation, 2015, we are enclosing the Annual Secretarial Compliance Report of the company received from M/s. Mahata Agarwal & Associates peer reviewed Practising Company Secretaries on 28th May, 2026 for the Financial Year ended 31st March, 2026.

This is for your information and records please.

Thanking you.

Yours Faithfully,

Debanuj Digitally signed by
Debnath Debanuj Debnath
Date: 2026.05.29
18:52:03 +05'30'

Debanuj Debnath
Company Secretary & Compliance Officer

Encl: As above



SECRETARIAL COMPLIANCE REPORT

BHARAT COKING COAL LIMITED

(CIN: L10101JH1972GOI000918)

Koyla Bhawan, Koyla Nagar, BCCL Township, Dhanbad, Jharkhand – 826005

for the year ended 31st March, 2026 [Reg 24(A), SEBI LODR REG, 2015]


We, Mahata Agarwal & Associates (Unique No: P2021WB088100) (P.R No. 5663/2024), Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s Bharat Coking Coal Limited (CIN: L10101JH1972GOI000918)** (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges
- (c) website of the listed entity which is <https://bcclweb.in/>
- (d) all other document / filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2026 (“Review Period”), in respect of compliance with the provisions of:
 - (i) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
 - (ii) 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;
(during the period under review not applicable to the company)
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable as there is no instance of Buyback during the year under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(during the period under review not applicable to the company)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(during the period under review not applicable to the company)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(during the period under review not applicable to the company)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) All other regulations as may be applicable and circulars/ guidelines issued thereunder;

Sumanta Sanyal
Sreethi Mahata



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| | | | | | | Act, 2013 could not be conducted during the financial year. | | | ent of Independent Directors | |
| 3. | Para 5.1 of Chapter 5 of the DPE Guidelines on Corporate Governance for CPSEs | - | Remuneration Committee not properly constituted | - | - | The Remuneration Committee of the Company was not properly constituted during the financial year 2025-26 | - | The Company should reconstitute the Remuneration Committee in accordance with the applicable provisions of the DPE Guidelines. | As soon as requisite number of IDs are appointed by the Govt. Of India, Nominati on & Remunera tion Committe e will be reconstituted in complian ce with the applicable provisions . | Communica tion has been made with the Govt. of India for appointmen t of Independen t Director |
| 4. | Schedule IV of the Companies Act, 2013 and applicable provisions of the DPE Guidelines | - | Meeting of Independent Directors was not conducted | - | - | No separate meeting of Independent Directors was conducted during the financial year 2025-26 due to absence of requisite Independent Directors on the Board. | - | The Company should conduct separate meeting of Independent Directors. | Since there was not more than one Independent Director in the Board of the Company Meeting of Independent Directors could not be held. | |
| 5. | Schedule IV of the Companies Act, 2013 and applicable provisions of the DPE Guidelines | - | Induction/familiarization programme for Independent Directors was not conducted | - | - | The Company did not conduct any induction/familiarization programme for | - | The Company is advised to conduct induction/familiarization programme for Independent Directors | BCCL nominates its Independent Directors for various induction/familiariz | |

Sumati Harathi Mahata



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| | | | | | | Independent Directors during the financial year 2025-26 | | | ation programme organized by IICA or other competent authorities. |
| 6. | Regulation 17 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 | Regulation 17 | Women director not appointed | - | - | The Company, being a top 1000 listed entity, did not have a Woman Director on its Board during the financial year 2025-26 | - | The Company is advised to appoint a Woman Director on its Board | It is a Government Company and appointment of Independent Directors is made by Govt. of India and Company has no role to play in the appointment of Women director. |
| 7. | Regulation 17(1) of the SEBI LODR Regulations | Regulation 17(1) | The company does not have sufficient number of Non-Executive Directors | - | - | The company does not have sufficient number of Non-Executive Directors during the financial year 2025-26 | - | The Company is advised to appoint a sufficient number of Non-Executive Directors on its Board | BCCL is a Government Company and appointment of Independent Directors is made by Govt. of India and Company has no role to play in the appointment of Independent |

Sunata Korthi Mahesh



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| | | | | | | | | | Directors | |
| 8. | Regulation 18 of the SEBI (LODR) Regulations, 2015 | Regulation 18 | Audit Committee not properly constituted | - | - | The Audit Committee did not have the requisite number of Independent Directors during FY 2025-26, resulting in non-compliance with the provisions of the DPE Guidelines on Corporate Governance for CPSEs | - | The Company is advised to reconstitute the Audit Committee in compliance with the applicable provisions at the earliest. | As soon as requisite number of IDs are appointed by the Govt. of India, Audit Committee will be reconstituted in compliance with the applicable provisions | Communication has been made with the Ministry of Coal for appointment of Independent Director |
| 9. | Regulation 19 of the SEBI (LODR) Regulations, 2015 | Regulation 19 | Nomination and Remuneration Committee not properly constituted | - | - | The Nomination and Remuneration Committee did not have the requisite number of Independent Directors during FY 2025-26 | - | The Company is advised to reconstitute the Nomination and Remuneration Committee in compliance with the applicable provisions at the earliest. | As soon as requisite number of IDs are appointed by the Govt. of India, Nomination and Remuneration Committee will be reconstituted in compliance with the applicable provisions | Communication has been made with the Ministry of Coal for appointment of Independent Director |

Santa Sarda



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| 10. | Regulation 25(7) of the SEBI (LODR) Regulations, 2015 | Regulation 25(7) | Induction/familiarization programme for Independent Directors was not conducted | - | - | The Company did not conduct any induction/familiarization programme for Independent Directors during the financial year 2025-26 | - | The Company is advised to conduct induction/familiarization programme for Independent Directors | BCCL nominates its Independent Directors for various induction/familiarization programme organized by IICA or other competent authorities. |
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

| Sr. No. | Compliance Requirement (Regulations /circulars/guidelines including specific clause) | Regulation /Circular No. | Deviations | Action Taken by | Type of Action | Details of Violation | Fine Amount | Observations/Remarks of the Practicing Company Secretary | Management Response | Remarks |
|---------|--|--------------------------|------------|-----------------|----------------|----------------------|-------------|--|---------------------|---------|
| N/A | | | | | | | | | | |




ADDITIONAL DISCLOSURES

On the basis of SEBI Notice No: 20230316-14 dated: 16th March, 2023, the following additional affirmations included are as follows:

| Sr. No. | Particulars | Compliance Status (Yes/No/NA) | Observation/Remarks by PCS* |
|---------|--|-------------------------------|---|
| 1. | Secretarial Standard The compliances of listed entities are in accordance with the Applicable Secretarial Standard (SS) issued by the Institute of Company Secretaries of India (ICSI) | Yes | Nil |
| 2. | Adoption and timely updation of the Policies: • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per | Yes Yes | Nil Nil |
| 3. | Maintenance and disclosures on Website: • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website | Yes Yes Yes | Nil Nil Nil |
| 4. | Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013 | Yes | Nil |
| 5. | To examine details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries | Not Applicable | The company don't have any subsidiary/material subsidiary |
| 6. | Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015 | Yes | Nil |
| 7. | Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations | No | Performance evaluation of the Independent Directors was not conducted. |
| 8. | Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall | NA NA | Audit Committee is not properly constituted due to lack of number of Independent directors. |

Ananta Kishor Mehta



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| | provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee | | |
| 9. | Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder. | Yes | Nil |
| 10. | Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015 | Yes | Nil |
| 11. | Actions taken by SEBI or Stock Exchange(s), if any: No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder | Yes | Nil |
| 12. | Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities. | Not Applicable | Nil |
| 13. | Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc. | Not Applicable | Nil |

Ananta Sachin Moha

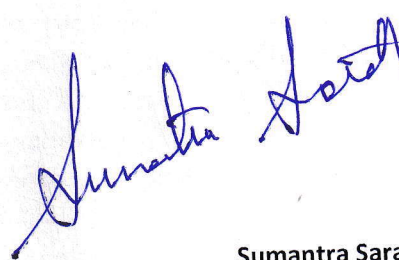



Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. Wherever required, we have obtained the Management representation/reports/certificates of technical subject experts about the compliance of laws, rules and regulations, happening of events, etc. and relied upon.
5. Maintenance of secretarial records is the responsibility of the management of the Company. My Responsibility is to express an opinion on these secretarial records, based on my inspection of records produced before us for Audit.
6. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Kolkata
Date: 28.05.2026

For Mahata Agarwal & Associates
Practicing Company Secretaries

UDIN: F011966H000515359

Sumantra Sarathi Mahata
Partner
Membership No.: F11966
CP No.: 13473