



## BURNPUR CEMENT LIMITED

**Registered Office :** 7/1 Anandilal Poddar Sarani (Russell Street)  
5th Floor, Flat No. : 5B, Kanchana Building, Kolkata-700071  
**Phone :** 033-4003 0212  
**CIN :** L27104WB1986PLC040831  
**Web :** www.burnpurcement.com  
**Email :** cs@burnpurcement.com

Dated: 30-08-2025

To  
National Stock Exchange of India  
Limited  
Exchange Plaza, Plot No. C/1, G-Block  
Bandra-Kurla Complex, Bandra (E)  
Mumbai - 400051  
NSE Symbol - BURNPUR

To  
BSE Limited  
1<sup>st</sup> Floor, New Trading Ring  
Rotunda Building  
P. J. Towers, Dalal Street Fort  
Mumbai- 400001  
BSE Scrip Code - 532931

Dear Sir/Madam,

**Sub: Intimation under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular no. SEBI/HO/CFD/CFDPoD-1/P/CIR/2023/123 dated July 13, 2023 and/or SEBI Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 (the "SEBI Circular") this is to inform you that Burnpur Cement Limited, received a notice from BSE for non-compliance vis- a-vis payment of fine. The required details as foresaid Regulation 30 and SEBI Circular are as follows:

| Sr. No. | Particulars                                                                                                                      | Details                                                                                                                                                                                       |
|---------|----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.      | Name of Authority                                                                                                                | 1. BSE Limited                                                                                                                                                                                |
| 2.      | Nature and details of action taken or order passed                                                                               | Imposition of fine of Rs.1,55,760/- including GST, for non-compliance with provisions of Regulation 17(1A) of the SEBI (LODR) Regulation 2015 in connection with the quarter ended June 2025. |
| 3.      | Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority | Notice received by email on 29 <sup>th</sup> August 2025.                                                                                                                                     |
| 4.      | Details of the violation(s) / contravention(s) committed or alleged to be committed                                              | Refer point no. 2 above.                                                                                                                                                                      |



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|    |                                                                                                                                 |                                                                                                                                                                                                                                                                                                           |
|----|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5. | Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible. | As the Company is currently under the management of an Asset Reconstruction Company (ARC), the imposition of fine would further strain its financial position. The Company is already facing significant financial difficulties due to no operations and Nil revenue generation during the F.Y 2024-2025. |
| 6. | Reason for delay                                                                                                                | The delay in submitting the said intimation post 24 hours from the occurrence of event was due to unforeseen internet connectivity issues we were facing at the time of submission, we regret the lapse and ensure timely compliances in the future.                                                      |

### Note:

We would like to draw your kind attention to the fact that the Management of the Company has been taken over by an Asset Reconstruction Company (ARC) i.e. M/s. UV Asset Reconstruction Company Limited (UVARCL) in exercise of powers under section 9(1)(a) read with section 15 of the SARFAESI Act.

M/s UVARCL, Asset Reconstruction Company had initially appointed Mrs. Poonam Srivastava as an additional Director of the Company w.e.f 01-10-2019 and who was regularized as an Independent director w.e.f. 30-09-2020 u/s 9(1) a read with section 15 and 16 of the SARFAESI Act 2002.

Further in terms of Section 15(3)(a) of the SARFAESI Act, once the management of the business of the borrower has been taken over by a secured creditor, then notwithstanding anything contained under the Act (since it is the successor act of the Companies Act), it is not lawful for the shareholders of such borrower or any other person to nominate or appoint any person to be a director on the board of the borrower. The language of Section 15(3)(a) of the SARFAESI Act does not provide any carve-out for saving the powers of shareholders regarding the appointment/continuation of a director who has attained the age of 75 (seventy-five) years.

Mrs. Poonam Srivastava, a Non-Executive Independent Director who has attained the age of 75 years on 26<sup>th</sup> April 2025 and M/s UVARCL, Asset Reconstruction Company under section 15(3)(a) of the SARFAESI Act had confirmed through their letter dated 24-04-2025, the continuation of Mrs. Poonam Srivastava as an Independent Director of the Company beyond the age of 75 years.



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Further the SARFAESI Act (enacted after the Securities and Exchange Board of India Act, 1992 and Securities Contracts (Regulation) Act, 1956) being the later enactment compared to LODR Regulations (framed under Securities and Exchange Board of India Act, 1992 and Securities Contracts (Regulation) Act, 1956) with a non-obstante clause under Section 35 of the SARFAESI Act, the provisions as contained in Regulation 17(1A) of the LODR Regulations should not be construed as overriding Section 15(3) of SARFAESI Act.

The specific non obstante clause contained in Section 15(3) of the SARFAESI Act as well as general non obstante clause contained in Section 35 of the SARFAESI Act has the effect of giving overriding effect to the provisions of the SARFAESI Act to the extent of any inconsistency with other laws including LODR Regulation.

Section 35 of the SARFAESI ACT explicitly states that its provisions will override any other law including anything inconsistent with it demonstrating its overriding nature.

Therefore, UVARCL (ARC Company) may continue Mrs. Poonam Srivastava as an independent director of Burnpur Cement Ltd. beyond the age of 75 years, without any requirement of obtaining a special resolution from the shareholders of Burnpur Cement Ltd in terms of Regulation 17(1A) of the LODR Regulations.

M/s. UVARCL has also taken legal opinion from Shardul Amarchand Mangaldas & Co. Advocates & Solicitors, Delhi regarding this matter.

The Company is reviewing the said Notice and is assessing the next adequate legal steps on this matter.

We request you to take the aforesaid information on record and disseminate the same on your respective website.

Thanking You,

Yours Sincerely,

For Burnpur Cement Limited

*Punam Kumari Sharma*

Punam Kumari Sharma  
Company Secretary  
Encl: As Above

