

Ref. No.: BCCL: CS: F-Post-Listing:44

Dated: 26.09.2026

To,
Listing Department,
National Stock Exchange of India Limited
Mumbai-400051
Scrip Code 544678

To
Listing Department,
Bombay Stock Exchange Limited,
Mumbai-400051
Ref: ISIN – INE05XR01022

Sub: Disclosure under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015- Board comments on the fine levied by the Exchanges

In terms of Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations") Company is in receipt of notices from Bombay Stock Exchange (BSE) and National Stock Exchange of India dated 25.08.2026 regarding non-compliance with various provisions of SEBI (LODR) Regulations, 2015 for the quarter ended 30th June, 2026 and have imposed a fine of **₹11,12,740/-** (inclusive of GST) by each Stock Exchange i.e. Bombay Stock Exchange (BSE) and National Stock Exchange of India (NSE) for non-compliance of the provisions mentioned above.

Accordingly, Bombay Stock Exchange (BSE) and National Stock Exchange of India (NSE) have imposed the fines under different Regulations which are as under:

Applicable Regulation of SEBI (LODR) Regulations, 2015	Fine prescribed per day (in ₹)	Fine payable by the company as on August 25, 2026 (inclusive of GST @ 18 %) (in ₹)		
		Basic Fine	GST @ 18 %	Total Fine payable
Regulation 17(1) Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	5,000	4,55,000	81,900	5,36,900
Regulation 18(1) Non-compliance with the constitution of the Audit Committee	2,000	1,82,000	32,760	2,14,760
Regulation 19(1)/ 19(2) Non-compliance with the constitution of the Nomination and Remuneration Committee	2,000	1,82,000	32,760	2,14,760
Regulation 20(2)/(2A) Non-compliance with the constitution of the Stakeholder Relationship Committee	2,000	1,24,000	22,320	1,46,320
Total		9,43,000	1,69,740	11,12,740

Thus, the aggregate amount of fine imposed by both Stock Exchanges is **₹22,25,480/- (inclusive of GST)**.

Earlier fines imposed for the quarter ended 31st March, 2026:

It is also pertinent to mention here that both the Exchanges had earlier imposed fines for non-compliance of various provisions for the quarter ended March, 2026. The details of the fines imposed by each Stock Exchange, as communicated on 27.05.2026, are as under:

Applicable Regulation of SEBI (LODR) Regulations, 2015	Fine prescribed	Fine payable by the company as on May 27, 2026 (inclusive of GST @ 18 %) (in ₹)
--	-----------------	---

	per day (in ₹)	Basic Fine	GST @ 18 %	Total Fine payable
Regulation 17(1) Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	5,000	3,60,000	64,800	4,24,800
Regulation 18(1) Non-compliance with the constitution of the Audit Committee	2,000	1,44,000	25,920	1,69,920
Regulation 19(1)/ 19(2) Non-compliance with the constitution of the Nomination and Remuneration Committee	2,000	1,44,000	25,920	1,69,920
Total		6,48,000	1,16,640	7,64,640

Accordingly, the aggregate amount of fines imposed by both the Stock Exchanges for the quarter ended 31st March, 2026 was **₹15,29,280/- (inclusive of GST)**.

The cumulative amount of fines imposed by both the Exchanges comes to ₹37,34,760/- (inclusive of GST) for quarter ended 31st March, 2026 and 30th June, 2026.

The non-compliance is mainly due to inadequate strength of Independent Directors on the Board, including absence of requisite Woman Independent Director, which consequently affected the constitution/composition of the Audit Committee, Nomination & Remuneration Committee and Stakeholder Relationship Committee in terms of SEBI (LODR) Regulations, 2015.

BCCL management has been continuously pursuing the matter with the Administrative Ministry for appointment of requisite number of Independent Directors, including a Woman Independent Director on the Board of the Company. The company has taken up the matter from time to time vide its letters, inter alia:

- Letter No. BCCL/CMD/F-7(C)/2024/233 dated 29.11.2024
- Letter No. BCCL/CMD/F-7(C)/2025/364 dated 30.05.2025
- Letter No. BCCL/CMD/F-2(A)/2025/474 dated 16.10.2025
- Letter No. BCCL/CMD/F-60(A)/2026/543 dated 22/24.01.2026
- Letter No. BCCL/CMD/F-60(A)/2026/614 dated 27.04.2026
- Letter No. BCCL/CMD/F-60(A)/2026/648 dated 02.06.2026
- Letter No. BCCL/CMD/F-2(A)/2026/720 dated 14/15.08.2026
- Letter No. BCCL/CMD/F-2(A)/2026/747 dated 11.09.2026

It is also pertinent to note that the company had actively taken up the matter with Securities and Exchange Board of India and obtained specific exemptions from compliance with SEBI (LODR) Regulations, 2015 up to the date of listing vide SEBI letters dated 12.09.2025 and 11.12.2025.

Further, appointment of Independent Directors in Central Public Sector Enterprises (CPSEs) is carried out by the Government of India with the approval of the Hon'ble President of India. Accordingly, the matter is beyond the direct control of the company.

As advised by Bombay Stock Exchange (BSE) and National Stock Exchange of India, the subject matter of non-compliance as identified by both the Exchanges was placed before the Board of Directors of BCCL in its meeting held on 26th September, 2026 and Board has made the following comments:

1. Submission of a request to the Stock Exchanges for waiver of the fines imposed stating the facts;
2. Taking up the matter with the Ministry of Coal (MoC) for appointment of Independent Directors on

the Board of the company for compliance with the provision of Companies Act, 2013, SEBI LODR Regulations, 2015 and if other applicable rules and regulations, if any.

This is for your kind information and records.

Yours faithfully,

For Bharat Coking Coal Limited

Debanuj Debnath
Company Secretary & Compliance Officer

