

BUY RIGHT IMPEX LIMITED

(Formerly Known as Buckingham Industries Limited)

Regd. Office- 38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Central Delhi, Delhi – 110055

Phone: 0120-4039976, Website: www.buyrightimpex.in

E-mail: buckingham1983@yahoo.com , CIN: L22100DL1983PLC314401

Date : 11.07.2023

To,

Metropolitan Stock Exchange Limited
205A, 2nd Floor,
Piramal Agastya Corporate Park, Kamani Junction,
L.B.S Road, Kurla West, Mumbai -400070

Calcutta Stock Exchange Limited
Manager, Listing Dept.
7, Lyons Range, Kolkata, West Bengal-700001

Ref: Submission of Annual Report for 2022-23 under Regulation 34 of SEBI (LODR) Regulations, 2015

We are hereby submitting the Annual Report of **BUY RIGHT IMPEX LIMITED** for Financial Year ended 2022-23 as required under Regulation 34 of SEBI (LODR) Regulations, 2015.

Kindly consider and take our submission in your records.

Thanking You
Yours faithfully

For **BUY RIGHT IMPEX LIMITED**

BUY RIGHT IMPEX LIMITED

RAVI BIRLA
(Director)
DIN: 10051907
Place: New Delhi

Director/Authorized Signatory

BUY RIGHT IMPEX LIMITED

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40TH ANNUAL REPORT 2022-23

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TABLE OF CONTENTS

S. No.	Contents	Page No.
01	Company Information	3
02	-Notice of Annual General Meeting -Explanatory Statements -Attendance Slip -Proxy Form	4
03	Director's Report	19
04	AOC-2	36
05	Extract of Annual Return	38
06	Management Discussion and Analysis Report	47
07	CEO/CFO Declaration	51
08	Declaration regarding compliance by Board Members	52
09	Auditor Certificate on Corporate Governance	53
10	Certificate of Non-Disqualification of Directors	54
11	Secretarial Audit Report	55
12	Independent Auditor's Report	58
13	Audited Annual Accounts as at 31.03.2023 & Schedules & Notes to the Accounts	69

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CORPORATE INFORMATION	
BOARD OF DIRECTORS	
Ravi Birla DIN: 10051907 Pooja Suri DIN: 09115153 Sanjeev Kumar Jha DIN: 02840583 Aarti DIN: 10125401 Neha Aggarwal PAN: AQDPA1749D	Whole Time Director Independent Director Independent Director Independent Director CFO
COMPANY SECRETARY & COMPLIANCE OFFICER	STATUTORY AUDITORS
Ms. Sonam Nandwani Email I.D. cssonamnandwani@gmail.com Contact No. 7404367323	M/s. BAS & CO. LLP Chartered Accountants, 804, Pearls Omaxe Building, Netaji Subhash Place, Delhi-110034
REGISTERED OFFICE	INTERNAL AUDITORS
38 G/F Rani Jhansi Road, Motia Khan, Paharganj, New Delhi-110055 Email ID: buckingham1983@yahoo.com Website: www.buyrightimpex.in Phone: 8527260705	Manish Gupta Chartered Accountants,M.No.530267 G-30/381-382, Pocket-G 30, Sector-3 Delhi-110085
SECRETARIAL AUDITOR	REGISTRAR AND TRANSFER AGENT
M/s V Kumar & Associates Company Secretaries Mr. Vivek Kumar, Proprietor Membership No. F8976 Add: 15/18, Basement , West Patel Nagar, New Delhi-110008 Tel: 9910218035 Email Id: csvivekumar@gmail.com	Skyline Financial Services Pvt. Ltd. R.O. D-153A, First Floor Okhla Industrial Area, Phase-I, New Delhi-110020 Tel.: 11-40450193-97 www.skylinerta.com
BANKERS	STOCK EXCHANGE
Punjab National Bank, ICICI Bank Ahimas Bhawan, New Rajendra Nagar, New Delhi-110060	METROPOLITAN STOCK EXCHANGE OF INDIA LIMITED 205(A), 2nd floor, Piramal Agastya Corporate Park, Kamani Junction, LBS Road, Kurla (West), Mumbai – 400070. CALCUTTA STOCK EXCHANGE LIMITED 7, Lyons Range, Dalhousie, Kolkata-700001, West Bengal.

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NOTICE

Notice is hereby given that the **40th Annual General Meeting** of the Shareholders of Buy Right Impex Limited will be on **Monday, August 07th, 2023** at **12.00 P.M.** held at its Registered Office of the Company situated at 38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Delhi-110055 to transact the following business:

ORDINARY BUSINESS:

1. To receive, consider and adopt the standalone Financial Statements of the Company for the year 2023 including audited Balance Sheet as at 31st March, 2023, the Statement of Profit and Loss and Cash Flow Statement for the year ended on that date and the Reports of the Board of Directors and Auditors thereon.

SPECIAL BUSINESS:

1. **Appointment of Mr. Ravi Birla (DIN- 10051907) as a Whole Time Director of the Company.**

To consider and if thought fit, to pass with or without modification(s), the following Resolution(s) as **Ordinary Resolution(s)**:

RESOLVED THAT in accordance with the provisions of Sections 196, 197, 203 and any other applicable provisions of the Companies Act, 2013 and the rules made there under (including any statutory modification or re-enactment thereof for the time being in force) read with schedule V to the Companies Act, 2013 and subject to such consent(s), approval(s) and permission(s) as may be required in this regard from any authority and agreed by the Board of Directors (hereinafter referred to as the Board, which term shall unless repugnant to the context by the Board in this behalf) as on 26th May 2023, approval of the Members of the Company be and is hereby accorded to appoint **Mr. Ravi Birla (DIN-10051907)** as Whole-time Director of the Company, for a period of 5 (Five) years with effect from 26th May 2023, on the terms and conditions including remuneration as set out in the Explanatory Statement annexed to the Notice convening this Meeting, with liberty to the Board of Directors to alter and vary the terms and conditions of the said appointment and / or remuneration as it may deem fit and as may be acceptable to Mr. Ravi Birla subject to the same not exceeding the limits specified under Schedule V to the Companies Act, 2013 or any statutory modification(s) or re-enactment thereof.

“RESOLVED FURTHER THAT the Board be and is hereby authorized to do all acts and take all such steps as may be necessary, proper or expedient to give effect to this resolution.”

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2. Regularization of additional director, Ms.Aarti (DIN- 10125401) by appointing her as a Non-Executive Independent Director of the Company

To consider and if thought fit, to pass with or without modification(s), the following Resolution(s) as **Ordinary Resolution(s)**:

"RESOLVED THAT Ms.Aarti (DIN- 10125401), who was appointed as an Additional Director with effect from 25th April, 2023 on the Board of Directors of the Company in terms of Section 161 of the Companies Act, 2013 and who holds office up to the date of this Annual General Meeting, be and is hereby appointed as an Independent Director of the Company.

RESOLVED FURTHER THAT, the Board of Directors of the Company be and are hereby severally authorized to sign the requisite forms documents and to do all such acts, deeds and things and execute all such documents, instruments and writings as may be required to give effect to the aforesaid resolution."

3. To consider reclassification of promoters of the company as public shareholders.

To consider and if thought fit, to pass with or without modification(s), the following Resolution(s) as **Ordinary Resolution(s)**:

"RESOLVED THAT pursuant to the provisions of Regulation 31A of SEBI (listing Obligations and Disclosure Requirements) Regulations, 2015 and any other relevant provisions, including any modification(s) or reenactment(s) thereof for the time being in force, and subject to necessary approvals from the Stock Exchanges and other appropriate statutory authorities, as may be necessary, the approval of the members be and is hereby accorded for re-classification of Sukhwinder Lal Gupta from "Promoter Category" to "Public Category".

Name	Number of shares	% to Paid up capital
Sukhwinder Lal Gupta	792,000	4.83
Total	792,000	4.83

RESOLVED FURTHER THAT the Board be and is hereby authorized to take all such steps as may be necessary, proper and expedient to give effect to the foregoing resolution.

RESOLVED FURTHER THAT any Director of the Company be and is hereby authorised to do all such acts, deeds and things as may be necessary, proper or expedient for the purpose of giving effect to the foregoing resolution, execute applications\other documents to be submitted to the stock exchange(s) and take all other steps in this regard."

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4. BORROWING POWERS OF THE COMPANY

To consider and, if thought fit, to pass, with or without modification (s) the following Resolution as a **Special Resolution**:-

RESOLVED THAT pursuant to the provisions of Section 180 (1) (c) and (2) and any other applicable provisions, if any, of the Companies Act, 2013, (including any statutory modifications, amendments or re-enactments thereto for the time being in force) consent of the Company be and is hereby accorded to the Board of Directors of the Company (hereinafter referred to as "the Board") for borrowing any sum or sums of monies from time to time for the purpose of the Company's business on such terms and conditions and with or without security from any bank, financial institution or any other lending institutions, firms, bodies corporate or persons, both in the national and international markets, as may be considered suitable by the Board notwithstanding that the sum or sums of monies to be borrowed together with the monies already borrowed by the Company (apart from temporary loans obtained or to be obtained from the Company's bankers in the ordinary course of business), may exceed the aggregate of the paid-up capital of the Company and its free reserves, provided that the total amount so borrowed by the Board shall not at any time exceed the limit of Rs.100 Crores (Rupees One Hundred Crores only) over and above the paid up capital of the Company and its free reserves.

5. AUTHORISATION UNDER SECTION 186 OF THE COMPANIES ACT, 2013

To consider and, if thought fit, to pass, with or without modification (s) the following Resolution as a **Special Resolution**:-

"RESOLVED THAT pursuant to the provisions of Section 186 of the Companies Act, 2013, read with The Companies (Meetings of Board and its Powers) Rules, 2014 as amended from time to time and other applicable provisions of the Companies Act, 2013 (including any amendment thereto or re-enactment thereof for the time being in force), if any, consent of the shareholders of the Company be and is hereby accorded to (a) give any loan to any person(s) or other body corporate(s) ; (b) give any guarantee or provide security in connection with a loan to any person(s) or other body corporate(s) ; and (c) acquire by way of subscription, purchase or otherwise, securities of any other body corporate from time to time in one or more tranches as the Board of Directors as in their absolute discretion deem beneficial and in the interest of the Company, for an amount not exceeding Rs.100,00,00,000 (Rupees One Hundred Crores Only) outstanding at any time, notwithstanding that such investments, outstanding loans given or to be given and guarantees and security provided are in excess of the limits prescribed under Section 186 of the Companies Act, 2013.

RESOLVED FURTHER THAT for the purpose of giving effect to the above, Executive Directors and Company Secretary of the Company, be and are hereby severally authorised to take such steps as may be necessary for obtaining approvals, statutory or otherwise, in relation to the above and to all matters arising out of and incidental thereto and to sign and to execute deeds, applications, documents and file returns with Registrar of Companies, that may be required, on behalf of the Company and generally to do all such acts, deeds, matters and things as may be necessary, proper, expedient or incidental for giving effect to this resolution."

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**By Order of the Board of Directors
For Buckingham Industries Limited**

Place: New Delhi

Date: 05.07.2023

**Sd/-
Sonam Nandwani
(Company Secretary)**

NOTES:

- (1) **A MEMBER ENTITLED TO ATTEND AND VOTE AT THE MEETING IS ENTITLED TO APPOINT A PROXY TO ATTEND AND VOTE ON A POLL AND SUCH PROXY NEED NOT BE A MEMBER OF THE COMPANY. A PERSON CAN ACT AS PROXY ON BEHALF OF MEMBERS NOT EXCEEDING FIFTY AND HOLDING IN THE AGGREGATE NOT MORE THAN TEN PERCENT OF THE TOTAL SHARE CAPITAL OF THE COMPANY. IN ORDER TO BE EFFECTIVE THE PROXIES SHOULD BE RECEIVED BY THE COMPANY AT ITS REGISTERED OFFICE NOT LESS THAN 48 HOURS BEFORE THE MEETING.** Proxies submitted on behalf of corporate including companies, societies etc., must be supported by an appropriate resolution of the Board of Directors or other governing body.
- (2) A person can act as a proxy on behalf of Members not exceeding fifty and holding in the aggregate not more than ten percent of the total share capital of the Company carrying voting rights and such person shall not act as a proxy for any other member.
- (3) Members are requested to bring their attendance slip along with their copy of Annual Report to the meeting, Proxies should fill in the attendance slip for attending the meeting.
- (4) Members are requested to quote their Folio Number/Client ID, in all correspondence and intimate any change in their address to the Share Transfer Agent/Depository Participant promptly.
- (5) In accordance with Circular No.14/2020 dated April 08, 2020, Circular No.17/2020 dated April13, 2020 read with Circular No. 20/2020 dated May 05, 2020 ('MCA') and Circular No. SEBI/HO/CFD/CMD1/CIR/P/2020/79 issued by SEBI ("circulars"), and owing difficulties involved in dispatching physical copies, the Notice of the AGM and Annual Report 2022-23 has been sent to member of the company, whose email registered with Company / RTA on July 07th, 2023. **Members may note that the Company will not send physical/ hard copies of the Annual Report 2022-23 and Notice of AGM.**
- (6) In compliance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with Circular No.14/2020 dated April 08, 2020, Circular No.17/2020 dated April 13, 2020 read with Circular No. 20/2020 dated May 05, 2020 , and read with SEBI Circular dated May 12, 2020") and other applicable circulars issued by the Ministry of Corporate Affairs (MCA) and SEBI (Collectively called "relevant circulars, Notice of the AGM along with the Annual Report 2022-23 is being sent only through electronic mode to those Members whose

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email addresses are registered with the Company/ company's Registrar and Share Transfer Agent Skyline Financial Services Pvt. Ltd (herein referred as 'RTA'). Members who email is not registered may note that the Notice and Annual Report 2022-23 will also be available on the Company's website www.buyrightimpex.in, websites of the Stock Exchanges i.e. Metropolitan Stock Exchange of India Limited at www.msei.in respectively.

- (7) An explanatory statement pursuant to section 102 of the Companies Act, 2013 relating to **Special Business 1 to 5** is annexed hereto and forms part of this notice.
- (8) Pursuant to provisions of Section 108 of the Companies Act, 2013 and Rule 20 of the Companies (Management and Administration) Rules, 2014, as amended by the Companies (Management and Administration) Amendment Rules, 2015 and Regulation 44 of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015, the Company is pleased to provide members facility to exercise their right to vote at the Annual General Meeting (AGM) by electronic means and the business may be transacted through e-Voting Services. The facility of casting the votes by the members using an electronic voting system from a place other than venue of the AGM ("remote e-voting") will be provided by National Securities Depository Limited (NSDL).
- (9) The Company has approached NSDL for providing e-voting services through our e-voting platform. In this regard, your Demat Account/Folio Number has been enrolled by the Company for your participation in e-voting on resolution placed by the Company on e-Voting system.
- (10) The Notice of the Annual General Meeting (AGM) of the Company inter alia indicating the process and manner of e-Voting process along with printed Attendance Slip and Proxy Form can be downloaded from the link provided <https://www.evoting.nsdl.com> or on website of the company at www.buyrightimpex.in or on the website of MSEI Limited at www.msei.in.
- (11) The e-voting period commences on **Friday, 04th August, 2023** (9:00 a.m.) and ends on **Sunday, 06th August, 2023** (5:00 p.m.). During this period shareholders of the Company, may cast their vote electronically. The e-voting module shall also be disabled for voting thereafter. Once the vote on a resolution is cast by the shareholder, the shareholder shall not be allowed to change it subsequently.
- (12) The voting rights of members shall be in proportion to their shares of the paid-up equity share capital of the Company as on the cut-off date of **Tuesday, 01st August, 2023**. Any person, who acquires shares of the Company and become member of the Company after dispatch of the notice and holding shares as of the cut-off date i.e., **Tuesday, 01st August, 2023**, may obtain the login ID and password by sending a request at evoting@nsdl.co.in
- (13) The facility for voting through remote e-voting shall be made available at the AGM and the members attending the meeting who have not cast their vote by remote e-voting shall be able to exercise their right at the meeting through ballot paper.
- (14) The detail procedure to login to e-Voting website and for e-voting is available in the Notes to

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the Notice of AGM. The Link of Annual Report along with Notice of AGM is at www.buyrightimpex.in or www.msei.in.

EXPLANATORY STATEMENT PURSUANT TO SECTION 102 OF THE COMPANIES ACT, 2013:

1. A statement setting out the material facts in the nature of concern of interest, financial or otherwise of every Director and the manager and every other key managerial person and relatives.
2. Information and facts to enable members to understand the meaning, scope and implications of the items of business and to take decision thereon.
3. None of the Director of the Company or their respective relative is concerned or interested, financial or otherwise, in passing of the below mentioned resolutions.

ITEM NO. 1

Appointment of Mr. Ravi Birla (DIN- 10051907) as a Whole Time Director of the Company.

The Board of Directors of the Company ('the Board') at the meeting held on 26th May, 2023, on the recommendation of the Nomination & Remuneration Committee, recommended for the approval of the Members, the appointment of Mr. Ravi Birla as Additional Director, and also as Whole time Directors of the Company, as set out in the respective Resolutions relating to his appointment, on the following remuneration: (I) Basic / Consolidated Salary – Rs.55,000/- per month excluding other allowances. The aggregate of the remuneration payable to the Whole time Directors and other Director of the Company taken together, shall be within the limit prescribed under the Companies Act, 2013, or any amendment thereto or modification thereof ('the Act'). Pursuant to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Secretarial Standard on General Meetings issued by ICSI, please find appended in Annexure-I details of Mr. Ravi Birla. Except Mr. Ravi Birla being the appointee, none of the Directors and Key Managerial Personal of the Company and their relatives are concerned or interested financially or otherwise, in the resolution set out as Item No. 1. Your Directors recommend the resolution at item no. 1 for your approval.

ITEM NO. 2

REGULARISATION OF ADDITIONAL DIRECTOR, MS. AARTI (DIN-10125401) BY APPOINTING HER AS AN INDEPENDENT DIRECTOR OF THE COMPANY.

Ms. Aarti (DIN-10125401), who was appointed as an Additional Director with effect from 25th April 2023 by the Board of Directors. According to the provision of Section 161 of the Companies Act, 2013 and the Article of Association of the company, she holds office as Director only up to the date of ensuing Annual General Meeting. Therefore, she is regularized as an Independent director from the ensuing Annual General Meeting.

The Board considers it desirable that the company should continue to avail itself of his services

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and hence recommends the resolution for approval of the shareholders as an Ordinary resolution.

None of the Directors / Key Managerial Personnel of the Company / their relatives (except Ms. Aarti) are, in any way, concerned or interested, financially or otherwise, in the resolution set out at Item No. 2 of this Notice.

ITEM NO. 3

RECLASSIFICATION OF PROMOTERS OF THE COMPANY AS PUBLIC SHAREHOLDERS.

The Company was in receipt of requests from Mr. Sukhwinder Lal Gupta, Part of Promoters of the Company, for reclassification from Promoter category to Public category under Regulation 31A (2) & (3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 („Listing Regulations, 2015“). Pursuant to procedure under Regulation 31(A) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and promoter seeking reclassification is now no more associated with Buy Right Impex Limited. It may be noted that he is neither involved in the management of Buy Right Impex Limited. nor hold controlling stake in Buy Right Impex Limited.

VIEW OF THE BOARD OF DIRECTORS

The above referred shareholder do not directly or indirectly, exercise control, over the affairs of the Company. He do not hold more than ten percent of the total voting rights in the Company. He also do not have any special rights through formal or informal arrangements with the Company or Promoters or any person in the Promoter Group. He will not represent on the Board of Directors of the Company either themselves or on behalf or through a nominee director and also will not act as Key Managerial Person in the Company for a period of 3 years from the date of such re-classification.

Based on the letter received from above promoter person, the matter was discussed by the Board of Director at their meeting held on 05th July, 2023 and the Board decided to get the above promoter/promoter group reclassified from the "Promoter Category" to "Public Category" subject to approval of members and stock exchanges.

On the basis of the request received by the Company and pursuant to the provisions of Regulation 31A (3)(b) of Listing Regulations, Promoters seeking reclassification confirmed that:

- i. The aforesaid persons do not hold more than ten per cent of the total Voting Rights in the Company;
- ii. The aforesaid persons do not exercise control over the affairs of the Company directly or indirectly;
- iii. The aforesaid persons do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements;
- iv. The aforesaid persons do not represent on the Board of Directors (including not having a Nominee Director) of the Company;

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v. The aforesaid persons do not act as a Key Managerial Person in the Company for a period of 3 years from the date of such re-classification;

vi. The aforesaid persons are not 'wilful defaulter' as per the Reserve Bank of India Guidelines;

Further, they have confirmed that subsequent to reclassification, they would continue to comply with the requirements as mentioned in Regulation 31A of Listing Regulations.

The Board recommends the resolution set forth in this Item for the approval of the Members.

ITEM NO.4

BORROWING POWERS OF THE COMPANY

The Company requires to borrow funds from time to time to meet both its short term and long terms business objectives, from various external agencies like banks, financial institutions, bodies corporate, individuals or other kind of lenders. According to section 180 (1) (c) of the Companies Act, 2013, the total amount of such borrowings as well as the outstanding at any time cannot exceed the aggregate of paid up capital and free reserves of the Company, except with the consent of the members. The Company felt that the said limit is not adequate and needs enhancement, accordingly the resolution has been proposed to increase the limits of borrowing to Rs. 100 Crores. It is recommended that the resolution be passed as special resolution. None of the Directors is interested or concerned in the resolution.

ITEM NO.5

AUTHORISATION UNDER SECTION 186 OF THE COMPANIES ACT, 2013

Section 186 of the Companies Act, 2013 permits the Company to invest the surplus funds of the Company in shares and securities of the any other body corporates in excess of the 60% of the aggregate of the paid-up share capital and free reserves and securities premium account of the Company or 100% of its free reserves and securities premium account of the Company, whichever is more, if the same is approved by the members of the Company. The present limit of Rs. 50 crore has been allocated for various investment avenues. In view of the new investment opportunities which may come up in the near future, it is proposed to increase the limit to Rs. 100 Crores.

Place: New Delhi
Date: 05.07.2022

By Order of the Board of Directors
For Buckingham Industries Limited
-sd
Sonam Nandwani
(Company Secretary)

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THE INSTRUCTIONS FOR MEMBERS FOR REMOTE E-VOTING ARE AS UNDER:-

The remote e-voting period begins on Friday, 04th August, 2023 at 9.00 A.M. and ends on Sunday, 06th August, 2023 at 5.00 P.M. The remote e-voting module shall be disabled by NSDL for voting thereafter. The Members, whose names appear in the Register of Members/Beneficial Owners as on the record date (cut-off date) i.e. Tuesday, 01th August, 2023 may cast their vote electronically . The voting right of shareholders shall be in proportion to their share in the paid-up equity share capital of the Company as on the cut-off date, being Tuesday, 01th August, 2023.

How do I vote electronically using NSDL e-Voting system?

The way to vote electronically on NSDL e-Voting system consists of “Two Steps” which are mentioned below:

Step 1: Access to NSDL e-Voting system

- A) Login method for e-Voting and joining virtual meeting for Individual shareholders holding securities in demat mode

In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.

Login method for Individual shareholders holding securities in demat mode is given below:

Type of shareholders	Login Method
Individual Shareholders holding securities in demat mode with NSDL.	<ol style="list-style-type: none">Existing IDeAS user can visit the e-Services website of NSDL Viz. https://eservices.nsdl.com either on a Personal Computer or on a mobile. On the e-Services home page click on the “Beneficial Owner” icon under “Login” which is available under ‘IDeAS’ section , this will prompt you to enter your existing User ID and Password. After successful authentication, you will be able to see e-Voting services under Value added services. Click on “Access to e-Voting” under e-Voting services and you will be able to see e-Voting page. Click on company name or e-Voting service provider i.e. NSDL and you will be re-directed to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.If you are not registered for IDeAS e-Services, option to register is available at https://eservices.nsdl.com. Select





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	<p>“Register Online for IDeAS Portal” or click at https://eservices.nsdl.com/SecureWeb/IdeasDirectReg.jsp</p> <p>3. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsdl.com/ either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon “Login” which is available under ‘Shareholder/Member’ section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.</p> <p>4. Shareholders/Members can also download NSDL Mobile App “NSDL Speede” facility by scanning the QR code mentioned below for seamless voting experience.</p> <p>NSDL Mobile App is available on</p> <p> App Store  Google Play</p> <div></div>
Individual Shareholders holding securities in demat mode with CDSL	<p>1. Existing users who have opted for Easi / Easiest, they can login through their user id and password. Option will be made available to reach e-Voting page without any further authentication. The URL for users to login to Easi / Easiest are https://web.cdslindia.com/myeasi/home/loginor www.cdslindia.com and click on New System Myeasi.</p> <p>2. After successful login of Easi/Easiest the user will be also able to see the E Voting Menu. The Menu will have links of e-Voting service provider i.e. NSDL. Click on NSDL to cast your vote.</p>

BUY RIGHT IMPEX LIMITED

(Formerly Known as Buckingham Industries Limited)

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	<p>3. If the user is not registered for Easi/Easiest, option to register is available at https://web.cdslindia.com/myeasi/Registration/EasiRegistration</p> <p>4. Alternatively, the user can directly access e-Voting page by providing demat Account Number and PAN No. from a link in www.cdslindia.com home page. The system will authenticate the user by sending OTP on registered Mobile & Email as recorded in the demat Account. After successful authentication, user will be provided links for the respective ESP i.e. NSDL where the e-Voting is in progress.</p>
Individual Shareholders (holding securities in demat mode) login through their depository participants	You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. Upon logging in, you will be able to see e-Voting option. Click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.

Important note: Members who are unable to retrieve User ID/ Password are advised to use Forget User ID and Forget Password option available at abovementioned website.

Helpdesk for Individual Shareholders holding securities in demat mode for any technical issues related to login through Depository i.e. NSDL and CDSL.

Login type	Helpdesk details
Individual Shareholders holding securities in demat mode with NSDL	Members facing any technical issue in login can contact NSDL helpdesk by sending a request at evoting@nsdl.co.in or call at : 022 - 4886 7000 and 022- 2499 7000
Individual Shareholders holding securities in demat mode with CDSL	Members facing any technical issue in login can contact CDSL helpdesk by sending a request at helpdesk.evoting@cdslindia.com or contact at 022-23058738 or 022-23058542-43
B) Login Method for e-Voting and joining virtual meeting for shareholders other than Individual shareholders holding securities in demat mode and shareholders holding securities in physical mode.	
<u>How to Log-in to NSDL e-Voting website?</u>	

BUY RIGHT IMPEX LIMITED

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1. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: <https://www.evoting.nsdl.com/> either on a Personal Computer or on a mobile.
2. Once the home page of e-Voting system is launched, click on the icon “Login” which is available under ‘Shareholder/Member’ section.
3. A new screen will open. You will have to enter your User ID, your Password/OTP and a Verification Code as shown on the screen.

Alternatively, if you are registered for NSDL eservices i.e. IDEAS, you can log-in at <https://eservices.nsdl.com/> with your existing IDEAS login. Once you log-in to NSDL eservices after using your log-in credentials, click on e-Voting and you can proceed to Step 2 i.e. Cast your vote electronically.

4. Your User ID details are given below :

Manner of holding shares i.e. Demat (NSDL or CDSL) or Physical	Your User ID is:
a) For Members who hold shares in demat account with NSDL.	8 Character DP ID followed by 8 Digit Client ID For example if your DP ID is IN300*** and Client ID is 12***** then your user ID is IN300***12*****.
b) For Members who hold shares in demat account with CDSL.	16 Digit Beneficiary ID For example if your Beneficiary ID is 12***** then your user ID is 12*****
c) For Members holding shares in Physical Form.	EVEN Number followed by Folio Number registered with the company For example if folio number is 001*** and EVEN is 101456 then user ID is 101456001***

5. Password details for shareholders other than Individual shareholders are given below:
 - a) If you are already registered for e-Voting, then you can use your existing password to login and cast your vote.
 - b) If you are using NSDL e-Voting system for the first time, you will need to retrieve the ‘initial password’ which was communicated to you. Once you retrieve your ‘initial password’, you need to enter the ‘initial password’ and the system will force you to change your password.
 - c) How to retrieve your ‘initial password’?
 - (i) If your email ID is registered in your demat account or with the company, your ‘initial password’ is communicated to you on your email ID. Trace the email sent to you from NSDL from your mailbox. Open the email and open the attachment i.e. a .pdf file. Open the .pdf file. The password to open the .pdf file is your 8 digit client ID for NSDL account, last 8 digits of client ID for

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(ii) CDSL account or folio number for shares held in physical form. The .pdf file contains your 'User ID' and your 'initial password'.

If your email ID is not registered, please follow steps mentioned below in **process for those shareholders whose email ids are not registered.**

6. If you are unable to retrieve or have not received the "Initial password" or have forgotten your password:
 - a) Click on "Forgot User Details/Password?" (If you are holding shares in your demat account with NSDL or CDSL) option available on www.evoting.nsdl.com.
 - b) Physical User Reset Password?" (If you are holding shares in physical mode) option available on www.evoting.nsdl.com.
 - c) If you are still unable to get the password by aforesaid two options, you can send a request at evoting@nsdl.co.in mentioning your demat account number/folio number, your PAN, your name and your registered address etc.
 - d) Members can also use the OTP (One Time Password) based login for casting the votes on the e-Voting system of NSDL.
7. After entering your password, tick on Agree to "Terms and Conditions" by selecting on the check box.
8. Now, you will have to click on "Login" button.
9. After you click on the "Login" button, Home page of e-Voting will open.

Step 2: Cast your vote electronically on NSDL e-Voting system.

How to cast your vote electronically on NSDL e-Voting system?

- (a) After successful login at Step 1, you will be able to see all the companies "EVEN" in which you are holding shares and whose voting cycle and General Meeting is in active status.
- (b) Select "EVEN" of company for which you wish to cast your vote during the remote e-Voting period and casting your vote during the General Meeting. For joining virtual meeting, you need to click on "VC/OAVM" link placed under "Join General Meeting".
- (c) Now you are ready for e-Voting as the Voting page opens.
- (d) Cast your vote by selecting appropriate options i.e. assent or dissent, verify/modify the number of shares for which you wish to cast your vote and click on "Submit" and also "Confirm" when prompted.
- (e) Upon confirmation, the message "Vote cast successfully" will be displayed.
- (f) You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page.
- (g) Once you confirm your vote on the resolution, you will not be allowed to modify your vote.

BUY RIGHT IMPEX LIMITED

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General Guidelines for shareholders:

1. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) are required to send scanned copy (PDF/JPG Format) of the relevant Board Resolution/ Authority letter etc. with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote, to the Scrutinizer by e-mail csvivekkumar@gmail.com to with a copy marked to evoting@nsdl.co.in.
2. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the “[Forgot User Details/Password?](#)” or “[Physical User Reset Password?](#)” option available on www.evoting.nsdl.com to reset the password.

Please note the following:

A member may participate in the AGM even after exercising his right to vote through remote e-voting but shall not be allowed to vote again at the AGM.

A person, whose name is recorded in the register of members or in the register of beneficial owners maintained by the depositories as on the cut-off date only shall be entitled to avail the facility of remote e-voting as well as voting at the AGM through ballot paper.

The Chairman shall, at the AGM, at the end of discussion on the resolutions on which voting is to be held, allow voting with the assistance of scrutinizer, by use of ballot paper for all those members who are present at the AGM but have not cast their votes by availing the remote e-voting facility.

The Scrutinizer shall after the conclusion of voting at the general meeting, will first count the votes cast at the meeting and thereafter unblock the votes cast through remote e-voting in the presence of at least two witnesses not in the employment of the Company and shall make, not later than three days of the conclusion of the AGM, a consolidated scrutinizer’s report of the total votes cast in favour or against, if any, to the Chairman or a person authorized by him in writing, who shall countersign the same and declare the result of the voting forthwith

Other information:

- Your login id and password can be used by you exclusively for e-voting on the resolutions placed by the companies in which you are the shareholder.
- It is strongly recommended not to share your password with any other person and take utmost care to keep it confidential.

In case of any queries, you may refer to the Frequently Asked Questions (FAQs) for members and e-voting user manual for members available at the Downloads sections of <https://www.evoting.nsdl.com> or contact NSDL at : 022 - 4886 7000 and 022- 2499 7000.

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Process for those shareholders whose email ids are not registered with the depositories for procuring user id and password and registration of e mail ids for e-voting for the resolutions set out in this notice:

- i. In case shares are held in physical mode please provide Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self-attested scanned copy of PAN card), AADHAR (self-attested scanned copy of Aadhar Card) by email to www.buyrightimpex.in.
- ii. In case shares are held in demat mode, please provide DPID-CLID (16 digit DPID + CLID or 16 digit beneficiary ID), Name, client master or copy of Consolidated Account statement, PAN (self-attested scanned copy of PAN card), AADHAR (self-attested scanned copy of Aadhar Card) to cbnl.delhi@gmail.com. If you are an Individual shareholders holding securities in demat mode, you are requested to refer to the login method explained at **step 1 (A)** i.e. Login method for e-Voting and joining virtual meeting for Individual shareholders holding securities in demat mode.
- iii. Alternatively shareholder/members may send a request to evoting@nsdl.co.in for procuring user id and password for e-voting by providing above mentioned documents.
- iv. In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are required to update their mobile number and email ID correctly in their demat account in order to access e-Voting facility.

THE INSTRUCTIONS FOR MEMBERS FOR e-VOTING ON THE DAY OF THE AGM ARE AS UNDER:-

1. The procedure for e-Voting on the day of the AGM is same as the instructions mentioned above for remote e-voting.
2. Only those Members/ shareholders, who will be present in the AGM through VC/OAVM facility and have not casted their vote on the Resolutions through remote e-Voting and are otherwise not barred from doing so, shall be eligible to vote through e-Voting system in the AGM.
3. Members who have voted through Remote e-Voting will be eligible to attend the AGM. However, they will not be eligible to vote at the AGM.
4. The details of the person who may be contacted for any grievances connected with the facility for e-Voting on the day of the AGM shall be the same person mentioned for Remote e-voting.

The result of voting will be announced at 38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Delhi-110055 by the Chairperson of the AGM on **Wednesday, 09th August, 2023**. The result of the voting will be communicated to the stock exchanges and will also be posted on the website of the Company.

**By Order of the Board of Directors
For Buckingham Industries Limited**

**Place: New Delhi
Date: 05.07.2023**

**Sd/-
Sonam Nandwan
(Company Secretary)**

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DIRECTOR'S REPORT

Dear Members,

Your Directors have pleasure to present their 40th Annual Report together with the Audited Statements of accounts for the Financial Year ended on 31st March, 2023.

FINANCIAL RESULTS

The performance of the Company for the financial year ended on 31st March, 2023 is summarized below:

Particulars	Year ended 31.03.2023 (in Thousands)	Year ended 31.03.2022 (in Thousands)
Income(Gross)	121,252.15	13,832.57
Expenses during the year excluding depreciation & interest	118998.93	11,460.68
Profit/(Loss) before depreciation & interest	2,253.22	1,201.970
Less: - Depreciation	5.61	7.67
Less: - Interest	0.00	0.00
Profit before Taxes	2,247.61	1,194.29
Less:- Provision for Taxation		
- Current Tax/MAT	773.92	437.110
- Short/Excess provision of taxation for previous period	268.60	-
- Deferred Tax	429.16	-431.16
Profit/(Loss) After Tax	775.93	1,188.35
Prior period adjustments		-
Profit/(Loss) for the year after tax and prior period adjustments	775.93	1,188.35

BUSINESS OPERATIONS

The fiscal year 2022-23 was a period of relative stability. During the year under review, our Company achieved a profit of Rs. 775,930/- after tax as against Profit Rs. 1,188,350/- in the preceding financial year. Your company hopes to increase its presence in the business in the Coming years, which may increase the top line and also its stability.

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DIVIDEND

Your Directors intend to plough back available resources for financial requirements and express their inability to recommend any dividend for the financial year.

RESERVES

No amount is proposed to be transferred to the Reserves and Surplus Account.

LIQUIDITY

Company continues to maintain sufficient funds to meet the desired strategic objectives.

SHARE CAPITAL

A. Increase in Authorised Share Capital.

During the year under review, the Authorised Share Capital of the Company has increased from the existing Rs. 11,00,00,000 (Rs. Eleven Crore Only) divided into 1,10,00,000 (One Crores Ten lakh Only) Equity Shares of face value of Rs. 10/- (Rupees Ten Only) each to Rs. 20,00,00,000 (Rupees Twenty Crores Only) divided into 2,00,00,000 (Two Crores Only) Equity Shares of Rs. 10/- (Rupees Ten Only) each.

B. Issue of Equity Shares through Preferential Allotment.

In view of expanding business operations, in order to augment the capital base and to meet capital requirements, the Company has raised capital by way of a Preferential Allotment of 14,00,000 Equity Shares of Rs.10 each on 25.08.2022.

C. Issue of Bonus Shares

The company has performed significantly well both in terms of Profit and business. As on March 31, 2023 total free Reserves and Surplus of the company is Rs. 87,44,180. With a view to capitalize the free Reserves and Surplus and to rationalize the capital structure. Company has issued 1,49,18,750 equity shares of Rs. 10/- each as bonus shares of an aggregate nominal value upto 14,91,87,500/- (Rupees Fourteen crore and Ninety one lakh eighty Seven Thousands Five hundred only), as bonus shares to the shareholders out of free reserves and surplus and Securities Premium Account.”

D. Issue of equity shares with differential rights

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Company has not issued any equity shares with differential rights so no disclosure is required as per rule 4 (4) of the Companies (Share Capital and Debentures) Rules 2014

E. Issue of sweat equity shares

Company has not issued sweat equity shares, so no disclosure is required as per rule 8 (13) of the Companies (Share Capital and Debentures) Rules 2014

F. Issue of employee stock options

Company has not issued employee stock options, so no disclosure is required as per rule 12(9) of the Companies (Share Capital and Debentures) Rules 2014

G. Provision of money by Company for purchase of its own share by employees or by trustee for the benefit of employees

Company has not made any provision for purchase of its own share by employees or by trustee for the benefit of employees so no disclosure is required as per rule 16(4) of the Companies (Share Capital and Debentures) Rules 2014

DIRECTORS AND KEY MANAGERIAL PERSONNEL

While selecting Directors, the Company looks for an appropriate balance of skills, experience, independence and knowledge to enable them discharge their respective duties and responsibilities effectively. The Company has laid down a clear Policy on remuneration of Directors, Key Managerial Personnel and other employees.

Mr. Tapan Garg(DIN- 07456359) resigned from the post of Non-Executive Independent Director w.e.f. 25.04.2023, **Mr. Bal Mukund Tiwari** (DIN: 02566683) resigned from the post of Non-Executive Independent Director w.e.f. 14.04.2022 and **Mr. Aditya Kohli** (DIN: 00822604)resigned from the post of Non-Executive Independent Director w.e.f. 30.06.2022

Ms. Aarti who was appointed as an Additional Director with effect from 25th April, 2023 on the Board of Directors of the Company in terms of Section 161 of the Companies Act,2013 and who holds office up to the date of this Annual General Meeting, be and is hereby regularized as a Non-Executive Independent Director of the Company.

Mr. Sulabh Dikshit (DIN: 07070194) resigned from the post of Whole Time Director w.e.f. 26.05.2023 and **Mr. Ravi Birla** (DIN: 10051907) who was appointed as an Additional Director with effect from 26th May, 2023 on the Board of Directors of the Company in terms of Section 161 of the Companies Act, 2013 and who holds office up to the date of this Annual General Meeting, be and is hereby regularized as a Whole Time Director of the Company.

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RISK MANAGEMENT POLICY

Risk Management Policy is not applicable to your company.

SUBSIDIARIES, JOINT VENTURE AND ASSOCIATE COMPANY

During the year under review, the Company has no Subsidiary/Joint Venture/ Associate Company.

PERFORMANCE AND FINANCIAL POSITION OF EACH OF THE SUBSIDIARIES, ASSOCIATES AND JOINT VENTURE COMPANIES INCLUDED IN THE CONSOLIDATED FINANCIAL STATEMENT

The Company has no subsidiaries, associates and joint venture companies so this point is not applicable on the Company.

DETAILS IN RESPECT OF FRAUDS REPORTED BY AUDITORS UNDER SUB-SECTION (12) OF SECTION 143 OTHER THAN THOSE WHICH ARE REPORTABLE TO THE CENTRAL GOVERNMENT

Auditors have not reported any frauds during the year under review.

LOANS, GURANTEES AND INVESTMENTS

Company has granted loans to corporates, firms & individual within specified limits prescribed under Section 186 of the Companies Act. All the provisions applicable are complied with.

PUBLIC DEPOSITS

During the year under review, the Company has not accepted any deposit under Section 73 of the Companies Act, 2013 read with Companies (Acceptance of Deposits) Rules, 1975.

AUDITORS

i. Statutory Auditors

M/s. BAS & CO. LLP, Chartered Accountants, the Statutory Auditors of the Company hold the office from 39th Annual General Meeting until the conclusion of the 44th Annual General Meeting and on such remuneration as may be decided by the Board of Directors with mutual consent of the appointee Auditors.

The Company has received letter from them to the effect that their appointment, if made, would be within the prescribed limits under Section 139(2) of the Companies Act, 2013 and that they are not disqualified for such appointment within the meaning of Section 139 (1) of the said Act.

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ii. Secretarial Auditor

M/s V Kumar and Associates, Company Secretaries (COP No.10438, FCS 8976), are the Secretarial Auditors of the Company to undertake the Secretarial Audit under the provisions of Section 204 of the Companies Act, 2013.

Internal Auditor

The Board has appointed, Chartered Accountants, CA. MANISH GUPTA (M. NO.-530267) to conduct Internal Audit for F.Y. 2022-2023.

AUDITOR'S REPORT

All Observations made in the Independent Auditors' Report and Notes forming part of the Financial Statements are self-explanatory and no qualifications, reservations or adverse remarks have been made by the Statutory Auditors in the said Report.

SECRETARIAL AUDIT & COMPLIANCE REPORTS

A copy of Secretarial Audit Report as provided by Company Secretary in Practice has been annexed to this Report as Annexure-V. The Secretarial Audit Report contain a reservation, qualification or adverse remark.

PERFORMANCE EVALUATION

Pursuant to the provisions of the Companies Act, 2013 and as per SEBI (LODR) Regulations 2015, a separate exercise was carried out to evaluate the performance of individual Directors including the Chairman of the Board who were evaluated on parameters such as level of engagement and contribution and independence of judgment thereby safeguarding the interest of the Company. The performance evaluation of the Independent Directors was carried out by the entire Board. The performance evaluation of the Chairman and the Non-Independent Directors was carried out by the Independent Directors. The Board also carried out annual performance evaluation of the working of its Audit, Nomination and Remuneration as well as Stakeholders Relationship Committee. The Directors expressed their satisfaction with the evaluation process.

EXTRACTS OF THE ANNUAL RETURN

The extract of the Annual Return in Form No.MGT – 9 as per Section 92 of the Companies Act 2013 is annexed as **Annexure 'A'**.

MANAGEMENT DISCUSSIONS AND ANALYSIS REPORT

In terms of the provisions of Regulation 34 of the SEBI (LODR) Regulations, 2015, the Management Discussion and Analysis Report is annexed as **Annexure 'B'** in a separate section forming part of the Annual Report.

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CORPORATE GOVERNANCE

As per Regulation 15(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Compliance with the Corporate Governance Provisions shall not apply in respect of the listed entity having paid up Equity Share Capital not exceeding Rupees Ten Crores and Net worth not exceeding Rupees Twenty Five Crores as on the last day of the previous financial year.

CORPORATE SOCIAL RESPONSIBILITY

Even though the provisions of Companies Act, 2013 regarding Corporate Social Responsibility are not attracted to the Company yet the Company has been, over the years, pursuing as part of its corporate philosophy, an unwritten CSR policy voluntarily which goes much beyond mere philanthropic gestures and integrates interest, welfare and aspirations of the community with those of the Company itself in an environment of partnership for inclusive development. Hence, the provisions of Sec 135 of the Companies Act, 2013 relating to CSR do not mandatorily apply to your company.

INDEPENDENT DIRECTOR

Independent Directors of the company have additionally met 2 times in the financial year 2022-23, including for:-

- (a) To review the performance of non-independent Directors and the Board as a whole,
- (b) To review the performance of Board taking into account the views of executive and non-executive directors;
- (c) To assess the quality, quantity and timeliness of flow of information between the company management and the Board which is necessary for the Board to effectively and reasonably perform their duties.

Sr. No.	Name of the Member	Meeting held	Meeting Due and Attended
1.	Mr. Sanjeev Kumar Jha	2	2
2.	Mr. Tapn Garg	2	2
3.	Ms. PoojaSuri	2	2

DECLARATION BY AN INDEPENDENT DIRECTOR(S)

The Company has received declarations from all the Independent Directors of the Company confirming that they meet the criteria of Independence as prescribed under sub-section (6) of Section 149 of the Companies Act, 2013 and SEBI (LODR) Regulation, 2015.

LISTING OF SHARES

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Equity Shares of the Company are listed on Metropolitan Stock Exchange of India (MSEI), Calcutta Stock Exchange (CSE) & Company has complied with the requirements of listing agreement(s) during the period under review. All the Quarterly & Yearly Compliances are upto-date, scanned pdf files are emailed, uploaded on MSEI listing portal, couriered by Speed-Post, XBRL submissions at online Portal, uploaded at Company's Website, etc.

-Listing Fee stands paid to MSEI for & upto 31.03.2024.

-Annual Custodial Fee stands paid to NSDL & CDSL

UNIFORM LISTING AGREEMENT

SEBI issued SEBI (LODR) Regulations, 2015 which become effective from 01.12.2015 by replacing existing Listing Agreement. The Company executed New Listing Agreement with MSEI (MCX) and CSE Ltd. during February 2016.

APPOINTMENT OF THE REGISTRAR & SHARE TRANSFER AGENT

At present Skyline Financial Services Pvt. Ltd is the Registrar & Share Transfer Agent of the Company. Members may contact the RTA for resolving any query related to shares or for effecting transfer of shares, etc.

OPERATIONS

Our reputation for excellence and integrity earned through the consistent delivery of quality work & by adhering the standard of business conduct through principles of Corporate Governance continues to be most valuable assets. As we position ourselves for the future, our standard of excellence, integrity and accountability will serve us well.

Further, no material events, commitment and changes occurred between the end of the financial year of the company to which the financial statements relate and to the date of this Report.

VIGIL MECHANISM

The Vigil Mechanism Policy of the Company, which also incorporates a whistle blower policy in terms of the Listing Agreement includes an Ethics & Compliance Task Force comprising senior executives of the company. Protected disclosures can be made by a whistle blower through an e-mail or telephone call or a letter to the task force or to the Chairman of the Audit Committee.

The policy on vigil mechanism is available on the company's website.

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E-mail: buckingham1983@yahoo.com , **CIN:** L22100DL1983PLC314401

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

Code of Conduct for the Prevention of Insider Trading is in accordance with the requirements specified in the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Board has adopted the same. Insider Trading Policy explains the guidelines and procedures to be followed and disclosures to be made while dealing with shares as well as the consequences of violation of norms. Insider Trading Policy is available on the website of the Company.

DEMATERIALISATION OF EQUITY SHARES

As mentioned in company's earlier Annual Reports, the company's equity shares are in compulsory Demat Mode in terms of SEBI Guidelines. This has been facilitated through arrangement with NSDL and CDSL. About 92.26% of the issued shares of the company are already in dematerialized form. M/s Skyline Financial Services Pvt. Ltd, New Delhi is acting as the RTA for this purpose and acts as share transfer agent in terms of SEBI Guidelines.

SIGNIFICANT & MATERIAL ORDERS PASSED BY THE REGULATORS OR COURTS OR TRIBUNALS IMPACTING THE GOING CONCERN STATUS OF THE COMPANY

No significant and material orders were passed by any Regulator(s) or Court(s) or Tribunal(s) which would impact the going concern status of the company.

PARTICULARS OF EMPLOYEES

In terms of the provisions of the Section 197(2) of the Companies ACT, 2013 read with Rule 5(2) & 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, None of the employee drew remuneration in excess of the limit set out in the said rules.

BOARD MEETINGS OF THE COMPANY

The Board met 11 times during the financial year. During the 11 months period ended 31st March, 2023. Board Meetings were held on 14.04.2022, 21.04.2022, 18.05.2022, 30.07.2022, 10.08.2022, 05.09.2022, 01.11.2022, 16.11.2022, 31.12.2022, 19.01.2023 and 07.02.2023.

PREVENTION OF SEXUAL HARRASMENT OF WOMEN AT WORKPLACE

The Company has a Policy on Prevention of Sexual Harassment of Women at Workplace and has complied with the provisions relating to the constitution of Internal Complaints Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. No case was reported during the year under review.

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RELATED PARTY TRANSACTIONS

All the related party transactions that were entered into during the financial year were in the ordinary course of Company's business and on arm's length basis. There are no materially significant related party transactions made by the Company with the Promoters, Key Management Personnel or other designated persons which may have potential conflict with the interest of the Company at large. However the related party transactions are given in **AOC-2**.

SHIFTING OF REGISTERED OFFICE

The Registered office of the Company shifted from C-125, G/F Lajpat Nagar, New Delhi-110024 to 38 G/F Rani Jhansi Road, Motia Khan, Paharganj, New Delhi-110055 in their Board Meeting held on 14.04.2022.

INTERNAL FINANCIAL CONTROLS AND THEIR ADEQUACY

According to Section 134(5)(e) of the Companies Act, 2013 the term Internal Financial Control (IFC) means the policies and procedures adopted by the company for ensuring the orderly and efficient conduct of its business, including adherence to company's policies, safeguarding of its assets, prevention and detection of frauds, errors, accuracy and completeness of the accounting records and timely preparation of financial information.

Company has well placed, proper and adequate internal financial control system, commensurate with the size, scale and complexity of its operations. The scope and authority of the Internal Audit function is well defined in the Organization. The internal financial control system ensures that all assets are safeguarded and protected and that the transactions are authorized, recorded and reported correctly.

Internal Auditors independently evaluate the adequacy of internal controls and audit the transactions. Independence of the audit and compliance is ensured by timely supervision of the Audit Committee over Internal Audit findings. Significant audit observations and corrective actions as suggested are presented to the Audit Committee on regularly basis.

SHARE TRANSFER SYSTEM

Shares lodged for physical transfer are registered within a period of 15 days, if the documents are clear and complete in all respects. The shares duly transferred would be dispatched to the Shareholders upon approval of transfers. Adequate care is taken to ensure that, no transfers are pending for more than a fortnight. As most of the Company's shares is currently in dematerialized form, the transfers are processed and approved in the electronic form by NSDL / CDSL through their depository participants. Skyline Financial Services Pvt. Ltd. is the common Share Transfer Agent for both physical and dematerialized mode.

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TRANSFER OF UNCLAIMED DIVIDEND TO INVESTOR EDUCATION AND PROTECTION FUND

Since there was no unpaid/unclaimed dividend declared and paid in past years, the provisions of Section 125 of the Companies Act, 2013, do not apply.

DIRECTOR'S RESPONSIBILITY STATEMENT

Pursuant to Section 134 (3)(c) of the Companies Act, 2013, with respect to Directors Responsibility statement, it is hereby confirmed that:-

- (i) In the preparation of the Annual accounts, the applicable accounting standards have been followed along with proper explanation relating to material departures, if any.
- (ii) The Directors have selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of the financial year and of the profit or loss of the Company for that period.
- (iii) The Directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of Companies Act, 2013 for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities.
- (iv) The Directors have prepared the annual accounts for the financial year ended 31st March 2023 on a going concern basis.
- (v) The Director had laid down internal financial controls to be followed by company and that internal financial controls are adequate and operating effectively.
- (vi) The Director had devised proper system to ensure compliance with provision of all applicable laws and such is adequate and operating effectively.

PARTICULARS REGARDING CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN PARTICULARS OF CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO

Information required to be given pursuant to this Clause are given below:

A. CONSERVATION OF ENERGY

Your company did not use any significant energy during the year under review. Your Company is conscious about its responsibility to conserve energy, power and other energy sources wherever possible. We emphasise towards a safe & clean environment & continue to adhere to all regulatory requirements & guidelines.

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B. RESEARCH & DEVELOPMENT

Your Company has not imported any technology for any research and development.

C. TECHNOLOGY ABSORPTION

Your Company has not imported any technology; however, we believe and use information technology in all spheres of our activities to improve efficiency levels.

D. FOREIGN EXCHANGE EARNINGS AND OUTGO.

	31.03.2022 (Amt.)	31.03.2023 (Amt.)
Foreign Exchange earning	Nil	Nil
Foreign Exchange outgo	Nil	Nil

ACKNOWLEDGEMENT

Your Directors wish to place on record and acknowledge their appreciation for the continued support and co- operation received from Government agencies and the shareholders. Your Directors also record their appreciation for the total dedication of employees at all levels.

By Order of the Board of Directors
For BUY RIGHT IMPEX LIMITED

Place: New Delhi
Date: 05.07.2023

Sd/-
Sanjeev Kumar Jha
Director
DIN:02840583

Sd/-
Ravi Birla
Whole Time Director
DIN: 10051907

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COMMITTEES OF THE BOARD

The Board has constituted & reconstituted the following standing Committees:

[A] Audit Committee

[B] Remuneration and Nomination Committee

[C] Shareholders/Investor's Grievance Committee

[A] AUDIT COMMITTEE

In pursuance of section 177 of the Companies Act, 2013 and other applicable laws Board of Directors of the Company has constituted/reconstituted an Audit Committee. The purpose of the audit committee is to ensure the objectivity, credibility and correctness of the Company's financial reporting and disclosure processes, internal controls, risk management policies and processes, tax Policies, compliance and legal requirements and associated matters.

i) Terms of reference

1. Oversight of the Company's financial reporting process and disclosure of its financial information to ensure that the financial statements are correct, sufficient and credible.
2. Recommending the appointment, remuneration and terms of appointment and change of statutory and internal auditors, fixation of audit fee and also approval for payment for any other services.
3. To review and monitor the independence and performance of Auditors & effectiveness of audit process.
4. Reviewing with Management the quarterly / half yearly and the annual financial statements before submission to the Board, focusing primarily on:
 - Matters required being included in the Director's Responsibility Statement to be included in the Board's report in terms of clause 3 (c) of section 134 of the Companies Act, 2013.
 - Any Change in accounting policies and practices.
 - Major accounting entries based on exercise of judgment by management.
 - The going concern assumption.
 - Compliance with accounting standards.
 - Compliance of legal requirements concerning financial statements.
 - Any related party transactions, etc.
5. Reviewing with the management, statutory and internal Auditors, the adequacy and compliance of internal control system.
6. Reviewing, with the management, the quarterly financial statements before submission to the Board for approval.
7. Reviewing the adequacy of internal audit function, reporting structure coverage and frequency of internal audit.
8. Discussion on internal Auditors significant findings and follow up there on.
9. Reviewing the findings of any internal investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the Board.
10. Discussions with statutory Auditors about the scope of audit as well as have post audit discussion to ascertain any area of concern.
11. Reviewing the Company's financial and risk management policies.

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12. Approval or any subsequent modification of transaction of the Company with the related parties.

13. Scrutiny of inter corporate loans and investments.

14. To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of non-payment of declared dividends) and creditors.

Further the Audit Committee shall mandatorily review the following information:

1. Management discussion and analysis of financial condition and results of operations;

2. Statement of significant related party transactions (as defined by the audit committee), submitted by management;

3. Management letters / letters of internal control weaknesses issued by the statutory auditors;

4. Internal Audit Reports relating to internal control weaknesses; and

5. The appointment, removal and terms of remuneration of the Internal Auditor shall be subject to review by the Audit Committee.

ii) Composition:

Sr. No.	Name of the Director	Category of Director
1.	Mr. Tapan Garg	Chairman, Independent Director
2.	Mr. Sanjeev Kumar Jha	Member, Independent Director
3.	Ms. PoojaSuri	Member, Independent Director
4.	Ms. Sonam Nandwani	Company Secretary

Audit Committee comprise of three members- Mr. Tapan Garg, Chairman, Independent Director, Mr. Sanjeev Kumar Jha, Member, Independent Director and Ms. Pooja Suri, Member, Independent Director. Mr.Tapan Garg is heading the Audit Committee.

The terms of reference of the Audit Committee, interalia, include overseeing financial reporting process, reviewing the financial statements and recommending appointment of Auditors.

Meeting and attendance:

Audit committee has met 4 (Four) times i.e. 18.05.2022, 10.08.2022, 01.11.2022 and 07.02.2023 during financial year 2022-23

Sr.No.	Name of the Member	Meetings held	Meetings Attended
1.	Mr. Tapan Garg	4	4
2.	Mr. Sanjeev Kumar Jha	4	4
3.	Ms. PoojaSuri	4	4

[B] REMUNERATION AND NOMINATION COMMITTEE

In Accordance with the provisions of Section 178 of the Companies Act, 2013, the Board of Directors of the Company also constituted/re-constituted a Committee of Directors to be known as Remuneration and Nomination Committee. The Role of The Remuneration and Nomination Committee and its

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constitution is given below.

Role of Remuneration and Nomination Committee:

1. To identify the persons who are qualified to become the director and who may be appointed in the senior management.
2. To lay down the criteria and policy for selection relating to the appointment of Directors, Officers in the senior Management position and their remuneration.
3. To recommend to the Board of Directors appointment and removal of Directors or officers in the senior management.

Constitution of the Committee:

Remuneration and Nomination Committee consist of the following Directors:

1. Mr. Tapan Garg , Chairman, Independent Director,
2. Mr. Sanjeev Kumar Jha, Independent Director
3. Ms. Pooja Suri, Independent Director

Mr. Tapan Garg Tiwari is the chairman of the committee.

Remuneration Policy

The Company has adopted a Remuneration Policy for the Directors, KMP and other employees, pursuant to the provisions of Act and SEBI (LODR) of the Listing Agreement.

ATTENDANCE RECORD & DETAILS OF THE COMMITTEE MEETING

Remuneration and Nomination committee have met 2 (Two) times i.e. 14.04.2022 and 30.07.2022 during financial year 2022-23.

Sr. No.	Name of the Member	Meetings held	Meetings Attended
1.	Mr. Tapan Garg	2	2
2.	Mr. Sanjeev Kumar Jha	2	2
3.	Ms.PoojaSuri	2	2

[C] SHAREHOLDERS' / INVESTORS' GRIEVANCE COMMITTEE

The purpose of constituting shareholders / Investors grievance committee is to expedite the process of redressal of investor's grievances and it is responsible for specifically to look into the matters related to the shareholders grievances and their complaints related to non-receipt of share certificates, transfers, non-payment of dividend, etc.

i) Terms of reference

1. To consider and review the queries/complaints received from Shareholders
2. To take steps to redress queries/ complaints and ensure speedy satisfaction.
3. To work under the control & supervision of the Board of Directors.

ii) Composition:

Shareholders/Investors Grievance Committee comprises of three members-

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Sr. No.	Name of the Director	Category of Director
1.	Mr. Tapan Garg	Chairman, Independent Director
2.	Mr. Sanjeev Kumar Jha	Member, Independent Director
3.	Ms. PoojaSuri	Member, Independent Director

Stakeholders Relationship Committee comprise of three members- Mr. Tapan Garg, Chairman, Independent Director, Mr. Sanjeev Kumar Jha, Member, Independent Director and Ms. Pooja Suri, Member, Independent Director. Mr. Tapan Garg is heading the Stakeholders Relationship Committee.

The Committee inter alia approves issue of duplicate share certificates and oversees and reviews all matters connected with the securities transfer. The Committee also looks into redressal of shareholders complaints like transfer/transmission of shares, non- receipt of Annual Report, non-receipt of declared dividends, etc. During the year, nil complaints were received from investors in respect of share transfers.

Meeting and attendance:

Shareholders/Investors Grievance committee has met 4 (Four) times i.e. 21.04.2022, 18.07.2022, 21.10.2022 and 18.01.2023 during financial year 2022-23.

Sr. No.	Name of the Member	Meetings held	Meetings Attended
1.	Mr. Tapan Garg	4	4
2.	Mr. Sanjeev Kumar Jha	4	4
3.	Ms. PoojaSuri	4	4

(i) Name, designation and address of Compliance Officer:

Ms. Sonam Nandwani

Company Secretary & Compliance Officer

Add:409-R, Model Town, Panipat, Haryana-132103

(ii) Status For Shareholders' Complaints For The Period 01.04.2022 to 31.03.2023

Complaint received from the shareholders of the Company during the year was duly resolved upto the satisfaction of our shareholders & no complaint was pending at the end of financial year.

Role and Powers of Shareholders'/Investor's Grievance Committee:

Shareholders'/ Investors' Grievance Committee shall have the following role, functions and responsibilities:

- To look into and supervise the redressal of shareholders/Investors Complaints.
- To oversee the performance of the RTA and recommend measures for overall improvement of the quality of investor services.
- To consider & approve transfer of shares, transmission of shares, dematerialization of shares, transposition of shares, issuance of duplicate share, deletion of names, splitting and consolidation

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of shares, etc.

[D] RISK MANAGEMENT COMMITTEE:

Not Applicable to the company.

ANNUAL GENERAL MEETINGS

(i) Location and time for the last 3 AGMs:-

Particulars	FY 2019-2020	FY 2020-2021	FY 2021-2022
Date and time	25 th September, 2019	24 th September, 2020	25 th August, 2022
Venue	R-489, GF-D, New Rajinder Nagar, New Delhi-110060	R-489, GF-D, New Rajinder Nagar, New Delhi-110060	38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Delhi-110055
Special Resolution	No	YES	YES

Details of attendance of Directors at various meetings of the Company is as follows:

Name of the Director	No. of Board Meetings Attended	Last AGM attended	Number of Directorships in other Public Companies		Number of Committee positions held in other Public Companies	
			Listed	Others	Chairman	Member
Mr. Tapan Garg	11	YES	-	1	-	-
Mr. Sanjeev Kumar Jha	11	YES	1	1	-	3
Mr. Sulabh Dikshit	11	YES	1	-	-	3
Ms. Pooja Suri	11	YES	1	-	-	3

* Denotes number of meetings held during the tenure of directorship of each director.

NOTES:

-None of the Directors of your Company is a member of more than 10 Committees or is the Chairman of more than five Committees across all the Public Companies in which they are Directors.

-The directorship/ committee membership is based on the disclosures received from the directors.

-No Director is inter-se related to any other Director on the Board of the Company.

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CODE OF CONDUCT

A Code of Conduct for Board Members and Senior Management is a comprehensive Code applicable to Executive and Non -Executive Directors as well as members of the Senior management.

Code of Conduct is available on the Company's website www.buyrightimpex.in

The Whole Time Director has stated that all Board Members have affirmed that they have complied with the code of conduct for the F.Y. 2022-23.

SEBI has notified the Prohibition of Insider Trading Regulations, 2015 applicable to all the listed companies' w.e.f. 15.05.2015.

Accordingly, Company has adopted code of internal procedures and conduct for prohibition of insider trading, as amended, in dealing with the securities of the company.

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FORM NO. AOC -2

(Pursuant to clause (h) of sub-section (3) of section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014)

Form for Disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub section (1) of section 188 of the Companies Act, 2013 including certain arm's length transactions under third proviso thereto.

- Details of contracts or arrangements or transactions not at arm's length basis.

Name (s) of the related party & nature of relationship	Nature of contracts/arrangements/transactions	Duration of the contracts/arrangements/transactions	Salient terms of the contracts or arrangements or transaction including the value, if any	Justification for entering into such contracts or arrangements or transactions	Date of approval by the Board	Amount paid as advances, if any	Date on which the special resolution was passed in General meeting as required under first proviso to section 188
NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

- Details of contracts or arrangements or transactions at Arm's length basis.

Name (s) of the related party & nature of relationship	Nature of contracts/arrangements/transactions	Duration of the contracts/arrangements/transactions	Salient terms of the contracts or arrangements or transactions including the value, if any	Date (s) of approval by the Board, if any	Amount paid as advances , if any
SADHNA BROADCAST LIMITED (COMPANY UNDER COMMON CONTROL)	Loan Received and Loan Repaid	During the F.Y. 2022-23.	During the F.Y. 2022-23 Loan Received, Loan Repaid	31/03/2023	NIL
SHARPLINE BROADCAST LIMITED (COMPANY UNDER COMMON CONTROL)	Loan Received, Loan Repaid and Commission Income	During the F.Y. 2022-23.	During the F.Y. 2022-23. 1. Loan Received, 2.Loan Repaid, 3.Commission	31/03/2023	NIL
TAPAN GARG	Director Remuneration	During the F.Y. 2022-23.	During the F.Y. 2022-23. 1.Director Remuneration	31/03/2023	NIL
SONAM NANDWANI (COMPANY SECRETARY)	Salary	During the F.Y. 2022-23.	During the F.Y. 2022-23. 1. Salary	31/03/2023	NIL

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SANJEEV KUMAR JHA (DIRECTOR)	Director Remuneration	During the F.Y. 2022-23.	During the F.Y. 2022-23. 1. Director Remuneration	31/03/2023	NIL
BAL MUKUND TIWARI (DIRECTOR)	Director Remuneration	During the F.Y. 2022-23.	During the F.Y. 2022-23. 1. Director Remuneration	31/03/2023.	NIL
SULABH DIKSHIT (DIRECTOR)	Director Remuneration	During the F.Y. 2022-23.	During the F.Y. 2022-23. 1. Director Remuneration	31/03/2023	NIL
POOJA SURI (DIRECTOR)	Director Remuneration	During the F.Y. 2022-23.	During the F.Y. 2022-23. 1. Director Remuneration	31/03/2023	NIL
NAMAN BROADCASTING & TELECOMMUNICATI ON PVT. LTD. (COMPANY UNDER COMMON CONTROL)	Telecast Exp.	During the F.Y. 2022-23.	During the F.Y. 2022-23. 1. Telecast Exp.	31/03/2023	NIL

By Order of the Board of Directors
For BUY RIGHT IMPEX LIMITED

Place: New Delhi
Date: 05.07.2023

Sd/-
Sanjeev Kumar Jha
Director
DIN: 02840583

Sd/-
Ravi Birla
Whole Time Director
DIN: 07070194

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ANNEXURE 'A'

FORM NO. MGT-9 EXTRACT OF ANNUAL RETURN as on Financial Year Ended on 31st March, 2023

[Pursuant to Section 92(3) of the Companies Act, 2013 and rule 12(1) of the Companies (Management and Administration) Rules, 2014]

I. REGISTRATION AND OTHER DETAILS:

CIN	L22100DL1983PLC314401
Registration date	16 th March, 1983
Name of the Company	BUY RIGHT IMPEX LIMITED (Formerly Known as Buckingham Industries Limited)
Category / sub-category of the Company	Company limited by shares
Address of the Registered office & Contact Details	38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Delhi-110055 Tel: 8527260705 Email: buckingham1983@yahoo.com Website: www.buyrightimpex.in
Whether listed Company	Yes Metropolitan Stock Exchange of India-MSEI Calcutta Stock Exchange Ltd.-CSE
Name, Address and Contact details of Registrar and Transfer Agent, if any	Skyline Financial Services Pvt. Ltd. R.O. D-153a, First Floor Okhla Industrial Area, Phase-New Delhi 110020 Tel.: 11-40450193-97 www.skylinerta.com

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

All the business activities contributing 10 % or more of the total turnover of the Company shall be stated:-

S. N o.	Name and Description of main products/services	NIC Code of the product/service	% to total turnover of the Company
1	Commission	51495	100

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III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

S.No	Name & Address of the Company	CIN/GLN	Holding/ Subsidiary	% of shares held	Applicable Section
	N.A	N.A	N.A.	N.A	N.A

IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)

i) Category wise shareholding

Category of Share holders	No. of Shares held at the beginning of the year				No. of Shares held at the end of the year				% change during the year
	De-mat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(1) Indian	-	-	-	-	-	-	-	-	-
a) Individual/ HUF	72,000	0	72,000	29.39	792,000	0	792,000	4.83	(24.56)
b) Central Govt/ State Govt.	-	-	-	-	-	-	-	-	-
c) Bodies Corporates	-	-	-	-	-	-	-	-	-
d) Bank/FI	-	-	-	-	-	-	-	-	-
e) Any other	-	-	-	-	-	-	-	-	-
SUB TOTAL:(A) (1)	72,000	0	72,000	29.39	792,000	0	792,000	4.83	(24.56)
(2) Foreign									
a) NRI- Individuals	-	-	-	-	-	-	-	-	-
b) Other Individuals	-	-	-	-	-	-	-	-	-
c) Bodies Corp.	-	-	-	-	-	-	-	-	-
d) Banks/FI	-	-	-	-	-	-	-	-	-
e) Any other	-	-	-	-	-	-	-	-	-
SUB TOTAL (A) (2)	-	-	-	-	-	-	-	-	-
Total Shareholding of Promoter (A)= (A)(1)+(A)(2)	72,000	0	72,000	29.39	792,000	0	792,000	4.83	(24.56)
B. Public Shareholding									

BUY RIGHT IMPEX LIMITED

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Phone: 0120-4039976, Website: www.buyrightimpex.in

E-mail: buckingham1983@yahoo.com , CIN: L22100DL1983PLC314401

(1) Institutions									
a) Mutual Funds	-	-	-	-	-	-	-	-	-
b) Banks/FI	-	-	-	-	-	-	-	-	-
c) Central Govt	-	-	-	-	-	-	-	-	-
d) State Govt.	-	-	-	-	-	-	-	-	-
e) Venture Capital Fund	-	-	-	-	-	-	-	-	-
f) Insurance Companies	-	-	-	-	-	-	-	-	-
g) FII's	-	-	-	-	-	-	-	-	-
h) Foreign Venture Capital Funds	-	-	-	-	-	-	-	-	-
i) Others (Specify)	-	-	-	-	-	-	-	-	-
SUB TOTAL (B)(1):									
(2) Non Institutions									
a) Bodies corporate	-	-	-	-	-	-	-	-	-
i) Indian	8000	-	8000	3.37%	4918000	-	4918000	29.97%	26.6
ii) Overseas	-	-	-	-	-	-	-	-	-
b) Individuals	-	-	-	-	-	-	-	-	-
i) Individual shareholders holding nominal share capital upto INR1 lakhs	1,600	14,650	16,250	6.632%	0	161150	161150	0.98%	(5.651)
ii) Individuals shareholders holding nominal share capital in excess of INR 1 lakhs	48,000	88,000	1,36,000	55.51%	9381225	9,68,000	103,49,225	63.06%	7.55
c) Others (specify)	-	-	-	-	-	-	-	-	-
Non-Resident Indians	-	-	-	-	-	-	-	-	-
Overseas Corporate Bodies	-	-	-	-	-	-	-	-	-
Clearing Member	-	-	-	-	-	-	-	-	-
Hindu Undivided	-	12,750	12,750	5.20	-	140,250	140,250	0.86%	(4.356)

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Families									
LLP	-	-	-	-	50000	-	50000	0.30%	0.304%
SUB TOTAL (B)(2):	NIL	173,000	173,000	70.61	143,49,225	126,94,000	156,18,625	95.17%	24.56
Total Public Shareholding (B)= (B)(1)+(B)(2)	NIL	245,000	245,000	100	151,41,225	12,69,400	164,10,625	100	0%
C. Shares held by Custodian for GDRs & ADRs	-	-	-	-	-	-	-	-	-
Grand Total (A+B+C)	NIL	245,000	245,000	100	151,41,225	12,69,400	164,10,625	100	0%

(ii) SHAREHOLDING OF PROMOTERS

S. No	Shareholders Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No of shares	% of total shares of the company	% of shares pledged encumbered to total shares	No of shares	% of total shares of the company	% of shares pledged encumbered to total shares	
1	Mr. S.L. Gupta	72,000	29.39	NIL	792,000	4.83	NIL	24.56
	Total	72,000	29.39	NIL	792,000	4.83	NIL	24.56

(iii) CHANGE IN PROMOTERS' SHAREHOLDING (SPECIFY IF THERE IS NO CHANGE)

S. No.	Name of each shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of Shares	% of total shares of the company	No of shares	% of total shares of the company
1	Mr. S.L. Gupta				
	At the beginning of the year	72,000	29.39	792,000	4.83
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase / decrease	On 31.12.2023 720,000 equity shares were allotted by way of Bonus Issue.			
	At the End of the year	792,000	4.83	792,000	4.83

BUY RIGHT IMPEX LIMITED**(Formerly Known as Buckingham Industries Limited)****Regd. Office-** 38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Central Delhi, Delhi – 110055**Phone:** 0120-4039976, **Website:** www.buyrightimpex.in**E-mail:** buckingham1983@yahoo.com , **CIN:** L22100DL1983PLC314401**(ii) Shareholding Pattern of top ten Shareholders (other than Directors, Promoters and Holders of GDRs and ADRs):**

Sl. No	Name of Shareholders	Shareholding at the beginning of the year		Increase/ Decrease in Shareholding	Cumulative Shareholding during the year	
	Name of the Shareholder	No. of shares at the beginning	% of total shares of the Company		No. of shares at the end	% of total shares of the Company
1.	KDM MEDIA PRIVATE	0	0	14.35	23,55,000	14.35
2.	SHARPLINE NETWORK PRIVATE	0	0	15.08	24,75,000	15.08
3.	SHILPA GUPTA	0	0	5.02	8,25,000	5.02
4.	SUBODH KUMAR NATH	0	0	5.23	8,59,375	5.23
5.	MAYA NATH	0	0	5.23	8,59,375	5.23
6.	ASHOK KUMAR SINGHAL	0	0	5.02	8,25,000	5.02
7.	SUMAN LATA	0	0	5.02	8,25,000	5.02
8.	VIKAS SINGLA	0	0	5.02	8,25,000	5.02
9.	PADMA GUPTA	0	0	5.40	8,86,875	5.40
10.	SUKHWINDER LAL GUPTA	72,000	29.39	24.56	7,92,000	4.83

NOTE: During the year company has issued equity shares, by way of preferential allotment and Bonus Issue.

(iii) Shareholding of Directors and Key Managerial Personnel

Sl. No		Shareholding at the beginning of the year 1 st April, 2022		Shareholding at the end of the year 31 st March, 2023	
	For Each of the Directors & KMP	No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1	SANJEEV KUMAR JHA	4000	1.63	44000	0.27
2	SULABH DIKSHIT	4000	1.63	44000	0.27
3	POOJA SURI	8000	3.27	88000	0.54

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4	TAPAN GARG	4000	1.63	44000	0.27
5	SONAM NANDWANI	-	-	-	-

V INDEBTNESS**Indebtedness of the Company including interest outstanding/accrued but not due for payment**

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtness at the beginning of the financial year				
I) Principal Amount	-	26,710.19	-	26,710.19
II) Interest due but not paid				
III) Interest accrued but not due				
Total (I+II+III)	NIL	NIL	NIL	NIL
Change in Indebtedness during the financial year				
• Addition	NIL	37,989.81	NIL	37,989.81
• Reduction				
Net Change				
Indebtedness at the end of the financial year				
I) Principal Amount	NIL	64,700	NIL	64,700
II) Interest due but not paid				
III) Interest accrued but not due				

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Total (I+II+III)	NIL	64,700	NIL	64,700
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VI. A Remuneration of Directors and Key Managerial Personnel Remuneration to Managing Director, Whole-time Directors and/or Manager

Sl. no	Particulars of Remuneration	Name of MD/MTD/ Manager	Total Amount
	Gross salary (a) Salary as per provisions contained in section 17(1) of the Income-tax Act , 1961 (b) Value of perquisites u/s 17(2) Income-tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income- tax Act,1961	Sulabh Dikshit NIL NIL	1,20,000/- NIL NIL
	Stock Option	-	-
	Sweat Equity	-	-
	Commission - as % of profit - others, specify	-	-
	Others, please specify	-	-
	Total (A)	-	1,20,000/-
	Ceiling as per the Act	NIL	5%

B. Remuneration to other Directors: The Company has provided remuneration to other Directors during the current financial year 2022-23.

Sl. No.	Particulars of Remuneration	Name of Directors	Total Amount (in Rs.)
	1. Independent Directors • Fee for attending board committee meetings • Commission -Others, please specify	BalMukund Tiwari and Sanjeev Kumar Jha and PoojaSuri 1,20,000/ 1,20,000/- 1,20,000/-	1,20,000/- 1,20,000/- 1,20,000/-

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	Total (1)	3,60,000/-	3,60,000/-
	Other Non-Executive Directors		
	• Fee for attending board committee meetings	NIL	NIL
	• Commission	NIL	NIL
	• Others, please specify	NIL	NIL
	Total (2)	NIL	NIL
	Total (B)=(1+2)	3,60,000/-	3,60,000/-
	Total Managerial Remuneration (A+B)	4,80,000/-	4,80,000/-
	Overall Ceiling as per the Act	NIL	11%

C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTD

Sl. No.	Particulars of Remuneration	Key Managerial Personnel			
		CEO	Company Secretary	CFO	Total (In Rs.)
			Ms. Sonam Nandwani	Ms. Neha Aggarwal	
1	Gross Salary (a) Salary as per provisions contained in section 17(1) of the Income Tax Act, 1961	N.A.	Rs. 1,43,000/-	N.A/-	Rs. 1,43,000/-
	(b) Value of perquisites u/s 17(2) of the Income Tax Act, 1961	-	-	-	-
	(c) Profits in lieu of salary under section 17(3) of the Income Tax Act, 1961	-	-	-	-
2	Stock Option	-	-	-	-
3	Sweat Equity	-	-	-	-
4	Commission - as % of profit	-	-	-	-
	others, specify	-	-	-	-
5	Others, please specify-	-	-	-	-
	Total	NIL	Rs. 1,43,000/-	NIL	Rs. 1,43,000/-

a. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

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Type	Section of the Companies Act	Brief Description	Details of Penalty/ punishment/compounding Fees imposed	Authority IRD/NCLT/ Court	Appeal made if any give details
NIL	NIL	NIL	NIL	NIL	NIL

**By Order of the Board of Directors
For BUY RIGHT IMPEX LIMITED**

**Place: New Delhi
Date: 05.07.2023**

**Sd/-
Sanjeev Kumar Jha
Director
DIN:02840583**

**Sd/-
Ravi Birla
Whole Time Director
DIN: 10051907**

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ANNEXURE 'B'

MANAGEMENT DISCUSSION AND ANALYSIS REPORT

Your Directors presents, Company's Management Discussion and Analysis Report for the year ended on 31.03.2023.

The management of the company is presenting herein the overview, opportunities and threats, initiatives by the company and overall strategy of the company and its outlook for the future. This outlook is based on management's own assessment and it may vary due to future economic and other future developments in the country.

FORWARD LOOKING STATEMENT

Statement in this report, particularly those which relate to Management Discussion and Analysis, describing the company's future plans, objectives, projections, estimates and expectations may constitute "forward looking statements" within the meaning of applicable laws and regulations. Actual results may vary materially from those either expressed or implied.

REAL ESTATE, CONSULTANCY & SERVICE SECTOR, ETC.

INDUSTRY STRUCTURE & DEVELOPMENTS

The Indian real estate sector has come a long way and is today one of the fastest growing markets in the world. It comprises of many sub-sectors -housing, retail, hospitality, farms, residential, and commercial. While housing contributes 5-6% of India's gross domestic product (GDP), the remaining sub-sectors are also increasing at a fast pace. The total realty market in the country is expected to touch US\$ 180 billion by 2025.

Real estate in India is being recognized as an infrastructure service that is driving the economic growth engine of the country. Growing infrastructure requirement in diverse sectors such as tourism, education, healthcare, etc., are offering several investment opportunities for both domestic as well as foreign investors. The role of the Government of India has been instrumental in the development of the sector including FDI in Real Estate. With the government trying to introduce developer and buyer friendly policies and law enforcement against delay in delivery & breach of commitments, the outlook for real estate sector does look promising.

OPPORTUNITIES

- Real estate contributes about 5% to India's GDP. The market size of this sector is expected to increase at a compound annual growth rate (CAGR) of 11.2% during F.Y. 2020-30.
- The Indian construction and real estate sector continues to be a favoured destination for global investors. Several large global investors, including a number of sovereign funds, have taken the first move by partnering with successful local investors and developers for investing in the Indian real estate market.

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- Residential asset class looks to have great potential for growth with housing requirements growing across cities.
- Demand for space from sectors such as education and healthcare has opened up ample opportunities in the real estate sector.
- The country still needs to add 3 million hospital beds to meet the global average of 3 for every 1,000 people.
- Government of India focus on affordable homes for all by 2023, the creation of 100 Smart Cities and infrastructure development across India, the real estate industry has much to look forward.

THREATS

- Covid & other pandemics, shortage of migrant labour, capital crunch in market.
- High inflation rate may increase the cost and company's profit margins may suffer.
- High interest rate may also prove to be adverse.
- Real estate industry is capital intensive sector which require high capital and in present scenario, it is challenge in front of management to arrange for the funds requirement.
- Tough competition from the other existing players in the industry also poses a threat.

OUTLOOK

INTERNAL CONTROL SYSTEMS AND THEIR ADEQUACY

The company has a proper and adequate system of internal controls & audit commensurate with its size to ensure that all assets are safeguarded and protected against loss from unauthorized use or disposition and the transactions are authorized, recorded and reported correctly. Proper controls and checks are exercised by the company by following the procedures prescribed in the various manuals. Audit Committee of the Board will review Internal Control Systems of the company on periodical basis.

DEVELOPMENTS IN HUMAN RESOURCES / INDUSTRIAL RELATIONS

Your company recognizes the value of human resource, therefore, the human resource policies are being framed in such fashion that they not only aim to achieve the organizational goal but also recognize, appreciate and develop the individual interest of the employees. The Human Resource Development policies of the company are being framed so that it is in the best interest of the organization as well as employees of the company.

BULLION, COMMODITIES, GEMS & JEWELLERY, AGENTS, CONSULTANCY, ETC.

INDUSTRY STRUCTURE AND DEVELOPMENTS

India has substantial reserves of gold, diamond, ruby and other gemstones. The gems and jewellery sector

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has been playing a very important role in the Indian economy and contributes about 6-7 % to the country's Gross domestic product (GDP), apart from large scale employment generations and foreign exchange earnings (FEE). The government of India has declared the sector as a focus area for export promotion based on its potential for growth and value addition. Sensing its immense potential, the Government of India has declared the sector as a thrust area for export promotion.

Indian gems and jewellery sector contributed US\$ 34,746.90 million to India's FEE. The primary segments of the sector in India are gold jewellery and diamonds & gems. India is the world's largest consumer of gold, accounting for over 20 % of the global gold consumption. The country is also the world's largest cutting and polishing centre for diamonds, with the cutting and polishing industry being well supported by government policies. India exports 95% of the world's diamonds, as per statistics from the Gems and Jewellery Export Promotion Council (GJEPC). The industry is projected to generate up to US\$ 35 billion of revenue from exports.

OPPORTUNITIES:

- The country is slowly starting to move towards branded jewellery and consumers are progressively accommodating modern retail formats.
- Gold jewellery exports from India increased on year to year basis.
- India has the high skilled low cost Labour.
- The Indian cut diamonds and designed jewellery which are in demand in the international market.

THREATS:

- Gold import is subject to high custom duty which fluctuates & can affect the business severely.
- Gold prices are also not stable that poses threat to the profit margin consequently.
- Tough competition from the other players may compel Company to offer competitive price and ultimately affect our profit margin.
- Money Market tightness and financial crunch.
- Alternative to Diamonds such as American Zirconia and CVD.
- Consumer avoiding Gold Jewellery as an investment option.
- Consumer preference towards branded & imported Designer Jewellery & Watches.
- Working Women does not prefer wearing any type of jewellery.

OUTLOOK

Overall business situation appears to be positive. Company has to concentrate on Project Development; in order to gain some ground in mass market segment. Assuming the inflation is brought under control and input prices remain at reasonable level, the domestic market is expected to continue to deliver a modest top line growth. With the continued effort on Retail upgradation and contemporary experience, the footfall and Brand image at the Retail level would be improved.

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RISK & CONCERN & BUSINESS ACTIVITIES

Aggressive competitions by new players, who wish to enter the category, pose a risk to the Company losing its market share. The Company will focus on contemporary designs, better value proposition in the product basket through continuous innovation and oncost management to mitigate the risks.

Business activities relating to real estates, commission, agents, brokers, management & business consulting, trading / purchase & sale of jewellery & commodities & bullion, etc. are comparatively risk free, attractive, etc.

**By Order of the Board of Directors
For BUY RIGHT IMPEX LIMITED**

**Place: New Delhi
Date: 05.07.2023**

**Sd/-
Sanjeev Kumar Jha
Director
DIN:02840583**

**Sd/-
Ravi Birla
Whole Time Director
DIN: 10051907**

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CHIEF EXECUTIVE OFFICER (CEO) / CHIEF FINANCIAL OFFICER (CFO) CERTIFICATION

I, Neha Aggarwal, Chief Financial Officer, of **BUY RIGHT IMPEX LIMITED**, to the best of my knowledge and belief hereby certify that:

- (a) I have reviewed financial statements and the cash flow statements for the year and that to the best of my knowledge and belief:
 - i) These statements do not contain any materially untrue statement or omit any material fact or contain statements that might be misleading;
 - ii) These statements together present a true and fair view of the Company's affairs and are in compliance with existing accounting standards, applicable laws and regulations
- b) There are no transactions entered into by the Company during the year that are fraudulent, illegal or violative of the Company's Code of Conduct;
- c) I accept responsibility for establishing and maintaining internal controls for financial reporting and have evaluated the effectiveness of internal control systems of the Company pertaining to financial reporting and we have disclosed to the auditors and the Audit Committee, deficiencies in the design and operations of such internal controls, if any, of which I am aware and the steps we have taken or propose to take to rectify the deficiencies.
- d) I have indicated to the auditors and the Audit Committee:
 - (i) Significant changes in the internal control over financial reporting during the year under reference;
 - (ii) Significant changes in the accounting policies during the year and that the same has been disclosed in the notes to the financial statements ;and
 - (iii) Instances of significant fraud of which we have become aware and the involvement therein, if any, of the management or an employee having a significant role in the Company's internal control system over financial reporting.

**By Order of the Board of Directors
For BUY RIGHT IMPEX LIMITED**

Date: 05.07.2023

Place: New Delhi

Sd/-

**Neha Aggarwal
Chief Financial Officer**

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DECLARATION REGARDING COMPLIANCE BY BOARD MEMBERS AND SENIOR MANAGEMENT PERSONNEL WITH THE COMPANY'S CODE OF CONDUCT

This is to confirm that the Company has adopted a Code of Conduct for its employees including the Managing Director. The Code of Conduct as adopted is available on the Company's website. I confirm that the Company has in respect of the Financial Year ended March 31, 2023, received from the Senior Management team of the Company and the members of the Board, a declaration of Compliance with the Code of Conduct as applicable to them.

For the purpose of this declaration, Senior Management Team means the Presidents, Sr. Vice Presidents and Vice President Cadre as on March 31, 2022.

**By Order of the Board of Directors
For BUY RIGHT IMPEX LIMITED**

**Place: New Delhi
Date: 05.07.2023**

**Sd/-
Sanjeev Kumar Jha
Director
DIN:02840583**

**Sd/-
Ravi Birla
Whole Time Director
DIN: 10051907**

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AUDITORS' CERTIFICATE ON CORPORATE GOVERNANCE

The Members of

BUY RIGHT IMPEX LIMITED

We have examined the compliance of conditions of Corporate Governance by **BUY RIGHT IMPEX LIMITED** for the year ended on March 31, 2023 as stipulated in SEBI (LODR) Regulations 2015.

The compliance of conditions of Corporate Governance is the responsibility of Management. Our examination was limited to procedures and implementation thereof, adopted by the Company to ensure compliance with the conditions of Corporate Governance. It is neither an audit nor an expression of opinion on the financial statements of the Company.

In our opinion and to the best of our information and according to the explanations given to us, we certify that the Company has complied with the conditions of the Corporate Governance as stipulated in the above-mentioned Listing Agreement.

We state that no investor grievances are pending for a period exceeding one month against the Company as per the records maintained by the Investors Grievance Committee.

We further state that such compliance is neither an assurance as to the future viability of the Company nor the efficiency or effectiveness with which the Management has conducted the affairs of the Company.

**For V Kumar & Associates
Company Secretary in Practice**

Place: New Delhi

Dated:10/07/2023

**Sd/-
(VIVEK KUMAR)**

FCS: 8976

COP: 10438

UDIN: F008976E000579425

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CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS

(Pursuant to Regulation 34(3) and Schedule V Para C clause (10) (i) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To,

The Members,

BUY RIGHT IMPEX LIMITED

Registered Office: 38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Delhi-110055

We have examined the relevant registers, records, forms, returns and disclosures received from directors of **BUY RIGHT IMPEX LIMITED (Formerly Known as Buckingham Industries Limited)** having CIN: L22100DL1983PLC314401 and having registered office at 38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Delhi-110055, (hereinafter referred to as “the Company”) produced before us by the Company for the purpose of issuing this certificate, in accordance with regulation 34(3) and Schedule V Para C clause (10) (i) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In our opinion and to the best of our information and according to the verifications (including Directors Identification Number (DIN) status at the portal www.mca.gov.in) as considered necessary and explanations furnished to us by the Company and its officers and representation given by the management we hereby certify that none of the Directors on the Board of the Company as stated below for the Financial Year ended on 31st March, 2023 have been debarred or disqualified from being appointed or continuing as Directors of companies by the Securities and Exchange Board of India, Ministry of Corporate Affairs, or any such other Statutory Authority:

Sr. No.	DIN	Name of Directors	Date of Appointment
1	02566683	BAL MUKUND TIWARI	05/02/2021
2	02840583	SANJEEV KUMAR JHA	05/02/2021
3	07070194	SULABH DIKSHIT	05/02/2021
4	09115153	POOJA SURI	31/03/2021
5	07456359	TAPAN GARG	14/04/2022

Ensuring the eligibility for the appointment/continuing of every Director on the Board is the responsibility of the management of the Company. Our responsibility is to express an opinion on these based on our verification. This certificate is neither an assurance as to the future viability of the Company nor of the efficiency or effectiveness with which the management has conducted the affairs of the Company.

For V Kumar & Associates
Company Secretary in Practice

Place: New Delhi

Date: 10.07.2023

Sd/-
(VIVEK KUMAR)

FCS: 8976

COP : 10438

UDIN: F008976E000579392

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E-mail: buckingham1983@yahoo.com , **CIN:** L22100DL1983PLC314401

SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED on 31.03.2023

[Pursuant to section 204(1) of the Companies Act, 2013 and the rules made thereunder]

To,

The Members,

BUY RIGHT IMPEX LIMITED

38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Delhi-110055

We have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by BUY RIGHT IMPEX LIMITED (**CIN : L27310DL1983PLC314401**) (hereinafter called the company). Secretarial Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts /statutory compliances and expressing our opinion thereon.

Based on our verification of the books, papers, minute books, forms and returns filed and other records maintained by the company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, We hereby report that in our opinion, the company has, during the audit period covering the financial year starting from 01.04.2022 ended on 31.03.2023 complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31st March 2023 according to the provisions of:

- (i) The Companies Act, 2013 (the Act) and the rules made thereunder;
- (ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;
- (v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):-

- (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;

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(d) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with the clients/Members;
(vi) and other laws applicable on the company.

We report that during the year under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above.

SEBI has taken action against Promoter of Buy Right Impex Limited (Formerly known as Buckingham Industries Limited) i.e. S. L. Gupta , however the promoter has submitted the reply and the matter is pending in the court.

We have also examined compliance with the applicable clauses of the Listing Agreements entered into by the Company with Metropolitan Stock Exchange of India Limited, Delhi Stock Exchange and Calcutta Stock Exchange, the trading platform is not available with the Calcutta stock exchange and recognition of Delhi Stock Exchange was withdrawn by the SEBI on 19th November 2014.

We further report that, except for passing of Resolution of Delisting from Calcutta Stock Exchange, there were no actions/events in pursuance of

- (a) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998;
- (b) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999;
- (c) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (d) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; requiring compliance thereof by the company during the financial year.
- (h) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Company has delayed in complying with the provisions of regulation 29(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 , however company has paid the penalty and complied with the said regulation.

We further report that based on information provided by the company, its officers and authorized representatives during the conduct of the audit, and also on the review of quarterly compliance reports by officials of the company taken on records by the Board of Directors of the company, in our opinion, adequate systems and processes and control mechanism exist in the company to monitor and ensure compliance with applicable laws.

We further report that the compliance by the company of applicable financial laws, like direct and Indirect tax laws, has not been reviewed in this Audit since the same have been subject to review by statutory financial audit and other designated professionals.

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. The changes in the composition of the Board of

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Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

Adequate notice is given to all directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.

As per the minutes of the meetings duly recorded and signed by the director/directors, the decisions of the Board were unanimous and no dissenting views have been recorded.

We further report that there are adequate systems and processes in the company commensurate with the size and operations of the company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

We further Report that during the audit period the company has not indulge in any matter related to the following:-

- (i) Public/Right/ Preferential/debentures/sweat equity issue, etc.
- (ii) Redemption / buy-back of securities
- (iii) Major decisions taken by the members in pursuance to section 180 of the Companies Act, 2013.
- (iv) Merger / amalgamation / reconstruction, etc.
- (v) Foreign technical collaborations etc.

For
V Kumar & Associates
(Company Secretaries)

Vivek Kumar
(Proprietor)
M. No. : F8976
COP No. : 10438
UDIN:- F008976E000579348

Date : 10-07-2023
Place: New Delhi

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INDEPENDENT AUDITOR'S REPORT

**To the Members of
BUCKINGHAM INDUSTRIES LIMITED**

Report on the Audit of the Standalone Ind AS Financial Statements

Opinion

We have audited the standalone Ind AS financial statements of Buckingham Industries Limited, which comprise the standalone balance sheet as at 31st March 2023, and the standalone statement of Profit and Loss, and the statement of cash flows for the year then ended, and notes to the standalone financial statements, including a summary of significant accounting policies and other explanatory information.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid Ind AS financial statements give the information required by the Act in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2023 and its profit, the changes in equity and its cash flows for the year ended on that date.

Basis for Opinion

We conducted our audit in accordance with Standards on Auditing (SAs) specified under section 143(10) of the Companies Act, 2013. Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the Companies Act, 2013 and we have fulfilled our other ethical responsibilities in accordance with these requirements and the ICAI's Code of Ethics.

Information other than the financial statements and auditors' report thereon

The Company's board of directors is responsible for the preparation of the other information. The other information comprises the information included in the Board's Report including Annexures to Board's Report but does not include the financial statements and our auditor's report thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained during the course of our audit or otherwise appears to be materially misstated.

If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

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Responsibilities of Management and Those Charged with Governance for the Standalone Ind AS Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation of these financial statements that give a true and fair view of the financial position, financial performance and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the accounting Standards specified under section 133 of the Act. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Those Board of Directors are also responsible for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the Standalone Ind AS Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Companies Act, 2013, we are also responsible for expressing our opinion on whether the company has adequate internal financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty

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exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. As required by the Companies (Auditor's Report) Order, 2020 ("the Order"), issued by the Central Government of India in terms of sub-section (11) of section 143 of the Companies Act, 2013, we give in the 'Annexure A', a statement on the matters specified in paragraphs 3 and 4 of the Order, to the extent applicable.
2. As required by Section 143 (3) of the Act, we report that:
 - a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
 - b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
 - c) The Balance Sheet, the Statement of Profit and Loss and the Cash Flow Statement dealt with by this Report are in agreement with the books of account.
 - d) In our opinion, the aforesaid financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.
 - e) On the basis of the written representations received from the directors as on 31st March, 2023 taken on record by the Board of Directors, none of the directors is disqualified as on 31st March, 2023 from being appointed as a director in terms of Section 164 (2) of the Act.
 - f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in 'Annexure B'.

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- g) With respect to the matter to be included in the Auditor's Report under section 197(16), In our opinion and according to the information and explanations given to us, the remuneration paid by the Company to its directors during the current year is in accordance with the provisions of section 197 of the Act. The remuneration paid to any director is not in excess of the limit laid down under section 197 of the Act. The Ministry of Corporate Affairs has not prescribed other details under section 197(16) which are required to be commented upon by us.
- h) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us:
- i. The Company does not have any pending litigations which would impact its financial position.
 - ii. The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.
 - iii. There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.
 - iv. The Company has not declared or paid any dividend during the year in contravention of section 123 of the Companies Act, 2013.

For & on Behalf of
BAS & CO. LLP
Chartered Accountant
FRN 323347E/E300008

(Ritika Agarwal)
M. No: 527731
UDIN : 23527731BGUAWY3745
Date: 25th April, 2023
Place: New Delhi

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ANNEXURE "A" TO THE INDEPENDENT AUDITOR'S REPORT

(Referred to in paragraph 1(f) under "Report on Other Legal and Regulatory Requirements" section of our report to the Members of Buckingham Industries Limited' of even date)

Report on the Internal Financial Controls Over Financial Reporting under Clause (i) of Sub - section 3 of Section 143 of the Companies Act, 2013 ("the Act")

We have audited the internal financial controls over financial reporting of Buckingham Industries Limited ("the Company") as of March 31, 2023 in conjunction with our audit of the Ind AS financial statements of the Company for the year ended on that date.

Management's Responsibility for Internal Financial Controls

The Board of Directors of the Company is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India. These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively or ensuring the orderly and efficient conduct of its business, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

Auditor's Responsibility

Our responsibility is to express an opinion on the internal financial controls over financial reporting of the Company based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting (the "Guidance Note") issued by the Institute of Chartered Accountants of India and the Standards on Auditing prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

Our audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness.

Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

We believe that the audit evidences we have obtained, are sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting.

Meaning of Internal Financial Controls Over Financial Reporting

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in

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accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that

(1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company;

(2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and

(3) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

Limitations of Internal Financial Controls Over Financial Reporting

Because of the inherent limitations of internal financial controls over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may occur and not be detected. Also, projections of any evaluation of the internal financial controls over financial reporting of future periods are subject to the risk that the internal financial control over financial reporting may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, to the best of our information and according to the explanations given to us, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at March 31, 2023, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

For & on Behalf of
BAS & CO. LLP
Chartered Accountant
FRN 323347E/E300008

Sd/-
(Ritika Agarwal)
M. No: 527731
UDIN : 23527731BGUAWY3745
Date: 25th April, 2023
Place: New Delhi

ANNEXURE 'B' TO THE INDEPENDENT AUDITOR'S REPORT

BUY RIGHT IMPEX LIMITED

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(Referred to in paragraph 2 under Report on Other Legal and Regulatory Requirements 'section of our report to the Members of BUCKINGHAM INDUSTRIES LIMITED of even date)

The Annexure referred to in paragraph 1 of Our Report on “Other Legal and Regulatory Requirements”.

We report that:

1. In respect of its Property, Plant and Equipment and Intangible Assets,
 - a) The company has maintained proper records showing full particulars, including quantitative details and situation of its Property, Plant and Equipment. The company does not have any Intangible assets.
 - b) As explained to us, Property Plant and Equipment have been physically verified by the management at reasonable intervals; no material discrepancies were noticed on such verification.
 - c) According to information and explanation given to us and on the basis of our examination of the records of the Company, the title deeds of immovable properties (except properties which are leased by the company with duly executed lease agreements in the company’s favor) disclosed in the financial statements are held in the name of the company.
 - d) The company has not revalued its Property, Plant and Equipment during the year.
 - e) There is no proceeding initiated against the company for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 (45 of 1988) and rules made thereunder.
2. In respect of its Inventories
 - (a) As explained to us & on the basis of the records examined by us, in our opinion, physical verification of inventory has been conducted at reasonable intervals by the management. In our opinion, the coverage and procedure of such verification by the management is appropriate. No discrepancy of 10% or more in the aggregate for each class of inventory were noticed on physical verification of stocks by the management as compared to book records.
 - (b) According to the information and explanations given to us and on the basis of our examination of the records of the Company, the company has not been sanctioned during any point of time of the year, working capital limits in excess of five crore rupees, in aggregate, from banks or financial institutions on the basis of security of current assets and hence reporting under clause 3(ii)(b) of the Order is not applicable.
3. In respect of loans, secured or unsecured, granted to the parties:
 - a) According to the information and explanations given to us, the Company has granted unsecured loan to following parties: -

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Annexure 3: Clause iii(a):Loans & Advances

	Guarantees	Security	Loans	Advances in nature of loans
Aggregate amount granted/ provided during the year				16,15,97,771
Subsidiaries				
- Joint Ventures	-	-	-	-
- Associates	-	-	-	-
- Others	-	-	-	16,15,97,771
Balance outstanding as at balance sheet date in respect of above cases				9,79,28,562
Subsidiaries	-	-	-	-
- Joint Ventures	-	-	-	-
- Associates	-	-	-	-
- Others	-	-	-	9,79,28,562

- (b) The investments made, guarantees provided, security given and the terms and conditions of the grant of all loans and advances in the nature of loans and guarantees provided are not prejudicial to the company's interest.
- (c) According to the information and explanations given to us and on the basis of our examination of the records of the Company, there is no stipulation of schedule of repayment of principal and payment of interest and therefore we are unable to comment on the regularity of repayment of principal & payment of interest. The company has taken reasonable step to recovery of the principal amount, wherever applicable.
- (d) According to the information and explanations given to us and on the basis of our examination of the records of the Company, since the term of arrangement do not stipulate any repayment schedule we are unable to comment whether the amount is overdue or not.
- (e) According to the information and explanations given to us and on the basis of our examination of the records of the Company, no loan or advance in the nature of loan granted which has fallen due during the year, has been renewed or extended or fresh loans granted to settle the overdues of existing loans given to the same parties.
- (f) Loans and advances are granted by the company without specifying any terms or period of repayment as follows:

Annexure 7: Clause iii (f): Loans or Advances repayable on demand

	Other Parties	Promoters	Related Parties
Aggregate amount of loans/ advances in nature of loans			

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- Repayable on demand (A)	-	-	-
- Agreement does not specify any terms or period of repayment (B)	12,17,37,746	-	-
Total (A+B)	12,17,37,746	-	-
Percentage of loans/ advances in nature of loans to the total loans	100.00%	-	-

4. According to the information and explanations given to us and on the basis of our examination of the records, in respect of loans, investments, guarantees, and security, provisions of section 185 and 186 of the Companies Act, 2013 have been complied with except non- charging of interest on the loan.
5. The company has not accepted any deposits or amounts which are deemed to be deposits from the public covered under sections 73 to 76 of the Companies Act. According to information and explanation provided to us, no order has been passed by Company Law Board or National Company Law Tribunal or Reserve Bank of India or any court or any other tribunal.
6. As per information & explanation given by the management, maintenance of cost records has not been specified by the Central Government under sub-section (1) of section 148 of the Companies Act.
7. In respect of statutory dues: -
 - a) According to the records of the company, undisputed statutory dues including Goods and Services Tax, Provident Fund, Investor Education and Protection Fund, Employees' State Insurance, Sales-tax, Service Tax, Goods and Service tax, Custom Duty, Excise Duty, value added tax, cess and any other statutory dues to the extent applicable, have generally been regularly deposited with the appropriate authorities. According to the information and explanations given to us there were no outstanding statutory dues as on 31st March 2023 for a period of more than six months from the date they became payable.
 - b) According to the information and explanations given to us, No dues were required to be deposited on account of any dispute with income tax or Goods and Services Tax or sales tax or service tax or duty of customs or duty of excise or value added tax. Therefore, this sub-clause is not applicable for this company;
8. There are no transactions which are not recorded in the books of account but have been surrendered or disclosed as income during the year before the income tax authorities under the Income Tax Act, 1961.
9. (a) According to the information and explanations given to us and on the basis of our examination of the records of the company, the company has not defaulted in repayment of loans or other borrowings or in the payment of interest thereon to any lender.

(b) According to the information and explanations given to us and on the basis of our examination of the records of the company, the company has not been declared a willful defaulter by any bank or financial institution or other lender;

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- c) According to the information and explanations given to us by the management, the Company has not obtained any term loans during the year. Accordingly, clause 3(ix)(c) of the Order is not applicable.
- (d) According to the information and explanations given to us and on an overall examination of the balance sheet of the Company, we report that no funds raised on short term basis have been used for long term purposes by the company.
- (e) The company has not taken any funds from any entity or person on account of or to meet the obligations of its subsidiaries, associates or joint ventures.
- (g) The company has not raised loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies.
10. (a) The company has not raised any money by way of initial public offer or further public offer (including debt instruments) ; therefore, this clause is not applicable.
- (b) According to the information and explanations given to us and on the basis of our examination of the records of the Company, the Company has utilized funds raised by way of preferential allotment or private placement of shares or convertible debentures (fully, partially or optionally convertible) for the purposes for which they were raised, except for the following:

Nature of Securities viz. Equity shares /Preference shares /Convertible debentures	Purpose for which funds were raised	Total Amount Raised /opening un-utilized balance	Amount utilized for the other purpose	Un-utilized balance as at Balance sheet date	Remarks, if any
Equity Share Capital	For Business expansion and to meet its Working capital requirement	14,33,90,625/-	14,33,90,625/-	Nil	The company has raised money to meet its working capital requirement but the same has been utilised by way of granting loans .

11. (a) According to the information and explanations given to us, we report that no fraud by the company or any fraud on the Company by its officers or employees has been noticed or reported during the year.
- (b) No report under sub-section (12) of section 143 of the Companies Act has been filed by the auditors in Form ADT-4 as prescribed under rule 13 of Companies (Audit and Auditors) Rules, 2014 with the Central Government;
- (c) There was no whistle blower complaint received by the company during the year, therefore this clause is not applicable.
12. The company is not a Nidhi Company, therefore this clause is not applicable.

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13. According to the information and explanations given to us, all transactions with the related parties are in compliance with sections 177 and 188 of Companies Act where applicable and the details have been disclosed in the Financial Statements etc. as required by the applicable accounting standards.
14. In respect of Internal Audit System;
 - (a) According to the information and explanations given by the management, the company has an internal audit system commensurate with the size and nature of its business.
 - (b) We have considered the internal audit reports of the company issued till date for period under audit.
15. The company has not entered into non-cash transactions with directors or persons connected with him.
16. The company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934. Hence the provisions of this clause are not applicable to the company.
17. Based on our examination, the company has not incurred cash losses in the financial year and in the immediately preceding financial year. Amount of cash loss during current financial year and in the immediately preceding financial.
18. There has been no resignation of any statutory auditors during the year.
19. On the information obtained from the management and audit procedures performed and on the basis of the financial ratios, ageing and expected dates of realisation of financial assets and payment of financial liabilities, other information accompanying the financial statements, the auditor's knowledge of the Board of Directors and management plans, we are of the opinion that no material uncertainty exists as on the date of the audit report that company is capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date;
20. The provisions of section 135 of the Companies Act are not applicable on the company.
Hence the company has no obligations under Corporate Social Responsibility.
21. The company is not required to prepare Consolidated Financial Statement hence this clause is not applicable.

For & on Behalf of
BAS & Co. LLP
Chartered Accountants
FRN 323347E/E300008

(CA Ritika Agarwal)
Mem No: 527731
Date: 25th April, 2023
Place: New Delhi
UDIN: 23527731BGUAWY3745

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BUCKINGHAM INDUSTRIES LIMITED CIN: L22100DL1983PLC314401 BALANCE SHEET AS AT MARCH 31, 2023			
(Amount in Thousands)			
Particulars	Note No.	As at March 31, 2023	As at March 31, 2022
ASSETS			
Non-current assets			
(a) Property, Plant and Equipment	2	15.44	21.05
(b) Financial assets	3		
(i) Loans		24,309.18	27,702.99
(ii) Other financial assets	4		
(c) Deffered Tax Assets (Net)		2.00	431.16
		24,326.62	28,155.20
Current assets			
(a) Inventories			
(b) Financial Assets			
(i) Investments	5	-	-
(ii) Trade Receivables	6	99,008.86	9,001.18
(iii) Cash and cash equivalents	7	4,554.86	682.63
(iv) Loans	8	97,928.56	45.08
(b) Other current assets		23,070.29	20,472.89
		224,562.57	30,201.78
TOTAL		248,889.19	58,356.97
EQUITY AND LIABILITIES			
Equity			
Equity share capital	9	164,106.25	2,450.00
Other equity	10	8,744.18	26,233.87

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		172,850.43	28,683.87
Liabilities			
Non- Current Liabilities			
(a) Financial Liabilities			
(i) Other Financial Liability	11		
-Security Payable		1,000.00	1,000.00
Current Liabilities			
(a) Financial Liabilities	12		
(i) Trade Payables		8,396.77	414.50
(ii) Borrowings	13	64,700.00	26,710.19
(b) Other current liabilities	14	1,113.50	1,090.54
(c) Provisions	15	828.50	457.87
		76,038.77	29,673.10
		248,889.19	58,356.97
TOTAL			

Refer accompanying Note nos. 1 to 21 forming part of the financial statements

Signed In terms of our report attached.**For and on behalf of the Board of Directors****As per our Report of even date annexed****For BAS & Co. LLP****Chartered Accountants****FRN .: 323347E/E300008****(CA Ritika Agarwal)****Designated Partner****M. No. 527731****UDIN: 23527731BGUAWY3745****Place : New Delhi****Date: 25-04-2023****(SULABH DIXIT)****Director****DIN-07070194****(SANJEEV KUMAR JHA)****Director****DIN-02840583****SONAM NANDWANI****(Company Secretary)****M.No.- 52672**

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<p style="text-align: center;">BUCKINGHAM INDUSTRIES LIMITED CIN: L22100DL1983PLC314401 Statement of Profit and Loss for the year ended March 31, 2023</p>				
(Amount in Thousands)				
Particulars		Note No.	For the Year Ended March 31, 2023	For the Year Ended March 31, 2022
I	Revenue from operations (gross)	16	116,734.09	11,384.80
II	Other Income	17	4,518.06	2,447.77
III	Total income (I + II)		121,252.15	13,832.57
IV	Expenses:			
	Cost of Material Consumed	18	-	-
	Purchase of Stock in trade		116,285.75	4,692.00
	Change in Inventories	19	-	-
	Employee benefits expense		623.00	612.00
	Finance Costs	2	-	-
	Depreciation and amortisation expense	20	5.61	7.67
	Other expenses		2,090.18	6,156.68
	Total expenses		119,004.54	11,468.35
VI	Profit/(loss) before exceptional item and tax (III-IV)		2,247.61	2,364.22
VI I	Exceptional item		-	-
	Prior Period Expenses		-	1,169.93
VI II	Profit/(loss) before tax (V-VI)		2,247.61	1,194.29

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IX	Tax expense/(credit):			
	Current tax		773.92	437.11
	Deferred tax		429.16	431.16
	Excess/short provision relating earlier year tax		268.60	-
IX	Profit/(loss) for the year (VII-VIII)		775.93	1,188.35
X	Other Comprehensive income/(loss)			
	Item that will not be subsequently reclassified to profit or loss			
	(a) Re-measurement gains/(losses) on defined benefit obligations		-	-
	(b) Income tax effect		-	-
	Item that may be subsequently reclassified to profit or loss:			
	(a) Cash flow hedges		-	-
	(b) Income tax effect		-	-
	Total Other Comprehensive income/(loss) for the year		-	-
XI	Total Comprehensive income/(loss) for the year		775.93	1,188.35
XI	Earnings/(loss) per equity share (of Rs. 10/- each)			
I	Basic and Diluted (in Rs. per share)	21	0.30	4.85

Refer accompanying Note nos. 1 to 21 forming part of the financial statements

Signed In terms of our report attached.

For and on behalf of the
Board of Directors

As per our Report of even date annexed

For BAS & Co. LLP

Chartered Accountants

FRN .: 323347E/E300008

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Sd/-

(SULABH DIXIT)

Director

DIN-07070194

(CA Ritika Agarwal)

Designated Partner

M. No. 527731

Place : New Delhi

Date : 25-04-2023

UDIN: 23527731BGUAWY3745

Sd/-

**(SANJEEV
KUMAR JHA)**

Director

DIN-02840583

Sd/

SONAM NANDWANI

(Company Secretary)

M.No.- 52672

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BUCKINGHAM INDUSTRIES LIMITED					
CIN: L22100DL1983PLC314401					
Cash Flow Statement for the year ended March 31, 2022					
(Amount in Thousands)					
		31.03.2023		31.03.2022	
A	CASH FLOW FROM OPERATING ACTIVITIES				
	Profit/(Loss) before tax		2,247.61		1,194.29
	Interest Received		-4,241.07		-2,447.77
	Depreciation		5.60		7.67
	Operating profit before working capital changes		-1,987.86		-1,245.81
	(Increase)/Decrease in Loans & Advances	-97,883.49			
	(Increase)/Decrease in Trade Receivables	-90,007.68		4,114.72	
	(Increase)/Decrease in other current assets	-2,798.40		-18,809.04	
	Increase/(Decrease) in Trade Payables	7,982.27		414.50	
	Increase/(Decrease) in Other Current liabilities	56.78		-1,115.13	
	Increase/(Decrease) in Provisions	-		20.76	
	Increase/(Decrease) in Security Payable	-		1,000.00	
	(Increase)/Decrease in Borrowings	37,989.81		-	
	Direct Taxes paid	-504.69	-145,165.40	2,948.94	-17,323.13
	CASH FLOW GENERATED FROM OPERATIONS		-147,153.26		-18,568.94
	Finance charges		-		-
	Net cash used in operating activities (A)		-147,153.26		-18,568.94
B	CASH FLOW FROM INVESTING ACTIVITIES				

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	Interest received	4,241.07	2,447.77
	Other income	-	-
	Net cash flow from investing activities (B)	4,241.07	2,447.77
C	CASH FLOW FROM FINANCING ACTIVITIES		
	(Increase)/Decrease in Loans & Advances	3,393.81	-10,618.78
	Increase /(Decrease) in Long Term Borrowings	-	26,710.19
	Increase in Share Capital	143,390.63	
	Increase /(Decrease) in Security refundable	-	-
	Net cash flow from financing activities (C)	146,784.44	16,091.42
	NET INCREASE /(DECREASE) IN CASH AND CASH EQUIVALENTS (A+B)	3,872.25	-29.75
	CASH AND CASH EQUIVALENTS		
	Beginning of the year	682.62	712.37
	End of the year	4,554.86	682.62
<p>Signed In terms of our report attached.</p> <p>As per our Report of even date annexed</p> <p>For BAS & Co. LLP</p> <p>Chartered Accountants</p> <p>FRN .: 323347E/E300008</p> <p>Sd/-</p> <p>(CA Ritika Agarwal)</p> <p>Designated Partner</p> <p>M. No. 527731</p> <p>UDIN: 23527731BGUAWY3745</p> <p>Place : New Delhi</p> <p>Date: 25-04-2023</p>			
<p>For and on behalf of the Board of Directors</p> <p>Sd/-</p> <p>(SULABH DIXIT)</p> <p>Director</p> <p>DIN-07070194</p> <p>Sd/-</p> <p>SONAM NANDWANI</p> <p>(Company Secretary)</p> <p>M.No.- 52672</p>			
<p>Sd/-</p> <p>(SANJEEV KUMAR JHA)</p> <p>Director</p> <p>DIN-02840583</p>			

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NOTES to the Ind-AS financial statements for the year ended March 31, 2023

COMPANY OVERVIEW

BUCKINGHAM INDUSTRIES LIMITED ("the Company") was incorporated on March 16, 1983 and is carrying the business of Project Management & Consultancy & Support Services, Real Estate - developers & builders & collaborators & trading & investment & dealer & underwriters, Commission Agents, Brokers, Service Providers, Trading, Agency, Commission, Business/ Management Consultancy, Importer, Exporters, Distributors, etc. and Certificate of Commencement was issued by ROC dated on March 24, 1983.

1. SIGNIFICANT ACCOUNTING POLICIES

A. General information and statement of compliance with Ind-AS

These standalone financial statements ('financial statements') of the Company have been prepared in accordance with the accounting principles generally accepted in India, including the Indian Accounting Standards ('Ind-AS') specified under Section 133 of the Companies Act, 2013 ('the Act') and other relevant provisions of the Act. The Company has uniformly applied the accounting policies during the periods presented.

These financial statements were approved for issue by the Board of Directors on 25-04-2023

B. Basis of preparation of Financial Statements

These financial statements have been prepared on the historical cost basis, except for certain financial instruments which are measured at fair values at the end of each reporting period, as explained in the accounting policies below. Historical cost is generally based on the fair value of the consideration given in exchange for goods and services. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

C. Functional and presentation currency

These Ind-AS Financial Statements are prepared in Indian Rupee which is the Company's functional currency.

D. Revenue Recognition

Revenue is measured at the fair value of the consideration received or receivable, net of discounts, volume rebates, outgoing sales taxes and other indirect taxes.

Interest income from a financial asset is recognized when it is probable that the economic benefits will flow to the Company and the amount of income can be measured reliably. Interest income is accrued on a time basis, by reference to the principal outstanding and at the effective interest rate applicable, which is the rate that exactly discounts estimated future cash receipts through the expected life of the financial asset to that asset's net carrying amount on initial recognition.

E. Property, Plant and Equipment

(i) Property, plant and equipment

The Company has applied Ind AS-16 with retrospective effect for all of its property, plant and equipment as at the transition date, viz., 1 April 2016.

The initial cost of property, plant and equipment comprises its purchase price, including import duties and non-refundable purchase taxes, attributable borrowing cost and any other directly attributable costs of bringing an asset to working condition and location for its intended use.

Expenditure incurred after the property, plant and equipment have been put into operation, such as repairs and maintenance, are normally charged to the statements of profit and loss in the period in which the costs are

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incurred.

When significant parts of plant and equipment are required to be replaced at intervals, the Company depreciates them separately based on their specific useful lives. Likewise, when a major inspection is performed, its cost is recognized in the carrying amount of the plant and equipment as a replacement if the recognition criteria are satisfied. All other repair and maintenance costs are recognized in the statement of profit and loss as incurred.

Gains and losses on disposal of an item of property, plant and equipment are determined by comparing the proceeds from disposal with the carrying amount of property, plant and equipment, and are recognized net within other income/other expenses in statement of profit and loss.

The residual values, useful lives and methods of depreciation of property, plant and equipment are reviewed at each financial year end and adjusted prospectively, if appropriate.

(ii) Depreciation

Assets in the course of development or construction and freehold land are not depreciated.

Other property, plant and equipment are stated at cost less accumulated depreciation and any provision for impairment.

Depreciation commences when the assets are ready for their intended use.

Depreciation is calculated on the depreciable amount, which is the cost of an asset less its residual value. Depreciation is provided at rates calculated to write off the cost, less estimated residual value, of each asset on a written down value basis over its expected useful life.

Major inspection and overhaul costs are depreciated over the estimated life of the economic benefit derived from such costs. The carrying amount of the remaining previous overhaul cost is charged to the statement of profit and loss if the next overhaul is undertaken earlier than the previously estimated life of the economic benefit.

Depreciation methods, useful lives and residual values are reviewed at each financial year end and changes in estimates, if any, are accounted for prospectively.

F. Cash and cash equivalents

Cash and cash equivalent in the balance sheet comprise cash at banks and on hand and short-term deposits with an original maturity of three months or less, which are subject to an insignificant risk of changes in value.

G. Inventories

Inventories are valued at the lower of cost and net realizable value except scrap and by products which are valued at net realizable value.

Costs incurred in bringing the inventory to its present location and condition, are accounted for as follows:

- a. Raw materials: cost includes cost of purchase and other costs incurred in bringing the inventories to their present location and condition. Cost is determined on weighted average basis.
- b. Finished goods and work in progress: cost includes cost of direct materials and labor and a proportion of manufacturing overheads based on the normal operating capacity, but excluding borrowing costs. Cost is determined on weighted average basis.

Net realizable value is the estimated selling price in the ordinary course of business, less estimated costs of completion and the estimated costs necessary to make the sale. Obsolete inventories are identified and written down to net realizable value. Slow moving and defective inventories are identified and provided to net realizable value.

The company does not have any inventory.

H. Taxation

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Current Income Tax

Current income tax assets and liabilities are measured at the amount expected to be recovered from or paid to the taxation authorities. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted, at the reporting date.

Current income tax relating to items recognized outside profit or loss is recognized outside profit or loss (either in other comprehensive income or in equity). Current tax items are recognized in correlation to the underlying transaction either in OCI or directly in equity. Management periodically evaluates positions taken in the tax returns with respect to situations in which applicable tax regulations are subject to interpretation and establishes provisions where appropriate.

I. Earnings per share

Basic earnings per share is computed by dividing the profit/(loss) for the year by the weighted average number of equity shares outstanding during the year. The weighted average number of equity shares outstanding during the year is adjusted for treasury shares, bonus issue, bonus element in a rights issue to existing shareholders, share split and reverse share split (consolidation of shares).

Diluted earnings per share is computed by dividing the profit/(loss) for the year as adjusted for dividend, interest and other charges to expense or income (net of any attributable taxes) relating to the dilutive potential equity shares, by the weighted average number of equity shares considered for deriving basic earnings per share and the weighted average number of equity shares which could have been issued on the conversion of all dilutive potential equity shares. Potential equity shares are deemed to be dilutive only if their conversion to equity shares would decrease the net profit per share from continuing ordinary operations. Potential dilutive equity shares are deemed to be converted as at the beginning of the period, unless they have been issued at a later date.

J. Advances, Loans, etc.

In the opinion of Board, all Current Assets, Advances, Loans, etc., have a value on realization in ordinary course of business at least equal to amount at which these are stated.

Statements of Accounts/ Confirmations have been sent by speed-post/ email on quarterly basis to Parties but from some of the parties, the same are pending receipts and reconciliation. The adjustments, if any, will be made accordingly.

K. Disclosure requirement under MSMED Act, 2006

The Company has not provided the details regarding the suppliers registered under Micro, Small and Medium Enterprises Development Act, 2006 (MSMED Act), Therefore, we are unable to comment on it.

Notes on Financial Statements

1. The SSI status of the creditors is not known to the Company; hence the information is not given.

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2. Trade receivables, Trade payables, Loans & Advances and Unsecured Loans have been taken at their book value subject to confirmation and reconciliation.

3. Payments to Auditors:

Amounts (in Thousands)

Auditors Remuneration	2022-23
Audit Fees	65.00
Tax Audit Fees	-
Company Law Matters	-
GST	-
Total	65.00

4. The Company has made advances to following parties without charging interest on loans: -

Particulars	Amount (in Thousands)
Akanksha Contracts Private Limited	24309.18
KDM Media Pvt Ltd	500.00
Securocrop Securities India Pvt Ltd	10000.00
Shilpi Arora	54.00
Virtu Exhibits Pvt Ltd	4750.00
Total	44959.184

5. No provision for retirement benefits has been made, The impact of the same on Profit & Loss is not determined.

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6. Advance to others includes advances to concerns in which directors are interested:

Name of Concern	Current Year Closing Balance	Previous Year Closing Balance
NA	NIL	NIL

7. Related Party disclosure as identified by the company and relied upon by the auditors:

(A) Related Parties and their Relationship

S. No.	Name of Related Party	Relationship
1	Bal Mukund Tiwari Sanjeev Kumar Jha Sulabh Dikshit Pooja Suri Sonam Nandwani Neha Agarwal	Director / Key Managerial Personnel (KMP)
2	Varun Media Private Limited Sharpline Broadcast Limited Sadhna Broadcast Limited KDM Business Network Ltd Venkateshwar Plantations Pvt. Ltd. Naman broadcastings and Telecommunications Private Limited. Peerless Media Solutions Private Limited Virtual Business Solutions Pvt Ltd	Enterprises over which KMP can exercise significant influence / Related Entity

(B) Transactions with Related parties

Transactions undertaken with Related Parties in the ordinary course of business during the year:

Nature of Transactions	Name of the Concern	Relation	Amounts (in Thousands)
Loan Received	Sadhna Broadcast Limited KDM Business Network Ltd Sharpline Broadcast Pvt Ltd	Company under Common Control	513.85 32375.00 9800.00
Loan Repaid	Sadhna Broadcast Limited KDM Business Network Ltd Sharpline Broadcast Pvt Ltd	Company under Common Control	1688.34 32375.00 35335.70
Director Remuneration	Sanjeev Kumar Jha	Director	120.00
Director Remuneration	Sulabh Dixit	Director	120.00

BUY RIGHT IMPEX LIMITED

(Formerly Known as Buckingham Industries Limited)

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Phone: 0120-4039976, **Website:** www.buyrightimpex.in

E-mail: buckingham1983@yahoo.com , **CIN:** L22100DL1983PLC314401

Director Remuneration	Bal Mukund Tiwari	Director	120.00
Director Remuneration	Pooja Suri	Director	120.00
Salary	Sonam Nandwani	Company Secretary	143.00

8. % of imported & indigenous raw material & consumables

Particulars	2023		2022	
	%	Amounts (in Thousands)	%	Amounts (in Thousands)
Imported	19.33	21767.85	0.00	0.00
Indigenous	80.67	90864.51	0.00	0.00

9. Value of Imports

Raw Material	Nil	Nil
Finished Goods	21767.85	Nil

10. Expenditure in Foreign Currency Nil Nil

11. Earning in Foreign Exchange Nil/- Nil/-

12. There are no contingent liabilities as on the balance sheet date.

13. During the year, the company has not borrowed from bank or financial institution.

14. There are no charges or satisfaction of charge pending to be registered with Registrar of Companies beyond the statutory period, as applicable.

15. The company has not been declared wilful defaulter by any bank or financial institution or other lender during the year.

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16. The company has complied with the number of layers prescribed u/s 2(87) of the Act read with Companies (Restriction on number of layers) Rules, 2017.
17. The company does not hold any Benami property and no proceeding have been initiated or pending against the company in such respect.
18. The company has not entered into any transactions with struck off companies.
19. The company has not traded or invested in Crypto currency or Virtual Currency during the year.
20. The company has made detailed assessment of its liquidity position and of the recoverability and carrying value of its assets as on the balance sheet date and has concluded that no material adjustments are required to be made in financial statements.
21. In the opinion of the management all the assets of the company have a value on realization in the ordinary course of business, at least equal to the amount at which they are stated in the financial statements.
22. Previous year figures have been regrouped/rearranged wherever necessary.
23. Whenever the balance confirmation is not available from the parties, the balance as appearing in the books of accounts have been considered and the same are subject to confirmation and reconciliation.

In terms of our Report attached of even date

For BAS & Co. LLP

Chartered Accountants

FRN: 323347E/E300008

Sd/-

(CA Ritika Agarwal)

Designated Partner

M. No. 527731

Place: New Delhi

Date: 25.04.2023

UDIN: 23527731BGUAWY3745

Sd/-

(SULABH DIKSHIT)

Director

DIN-07070194

Sd/-

(SANJEEV KUMAR JHA)

Director

DIN-02840583

BUY RIGHT IMPEX LIMITED**(Formerly Known as Buckingham Industries Limited)****Regd. Office-** 38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Central Delhi, Delhi – 110055**Phone:** 0120-4039976, **Website:** www.buyrightimpex.in**E-mail:** buckingham1983@yahoo.com , **CIN:** L22100DL1983PLC314401**BUCKINGHAM INDUSTRIES LIMITED****CIN: L22100DL1983PLC314401****Statement of Changes in Equity for the year ended March 31, 2023**

1 0	(Amount in thousands)
A	
Particulars	Shares Amount
Equity shares of Rs. 10/- each issued, subscribed and fully paid:	
As at March 31, 2022	245,000.00 2,450.00
As at March 31, 2023	16,410,625.00 164,106.25

B	(Amount in thousands)
.	
Other Equity	
Particulars	Securities Premium Reserve Reserve and Surplus OCI TOTAL
Balance as at March 31, 2021	- 25,045.53 25,045.53 - 25,045.53
Profit for the year	- 1,188.35 1,188.35 - 1,188.35
Other comprehensive income/(loss) for the year	- - - - -
Total comprehensive income/(loss) for the year	- 1,188.35 1,188.35 - 1,188.35
Balance as at March 31, 2022	- 26,233.87 26,233.87 - 26,233.87
Profit for the year	- 775.93 775.93 - 775.93
Issued During the Year	130,921.88 - 130,921.88 130,921.88

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Redeemed During the Year	- 130,921.88	-18,265.63	(149,187.50)		(149,187.50)
Other comprehensive income/(loss) for the year	-	-	-	-	-
Total comprehensive income/(loss) for the year	-	(17,489.69)	(17,489.69)	-	(17,489.69)
Balance as at March 31, 2023	-	8,744.18	8,744.18	-	8,744.18

Refer accompanying Note nos. 1 to 21 forming part of the financial statements

**Signed In terms of our report
attached.****For and on behalf of the
Board of Directors**

**As per our Report of even date
annexed
For BAS & Co.
LLP
Chartered
Accountants
FRN .:
323347E/E300008**

**(CA Ritika
Agarwal)
Designated
Partner
M. No. 527731
UDIN: 23527731BGUAWY3745
Date : 25-04-2023**

**(SULABH DIXIT)
Director
DIN-07070194**

**(SANJEEV KUMAR
JHA)
Director
DIN-02840583**

**SONAM NANDWANI
(Company Secretary)
M.No.- 52672**

BUY RIGHT IMPEX LIMITED**(Formerly Known as Buckingham Industries Limited)****Regd. Office-** 38 G/F Rani Jhansi Road, Motia Khan, Paharganj, Central Delhi, Delhi – 110055**Phone:** 0120-4039976, **Website:** www.buyrightimpex.in**E-mail:** buckingham1983@yahoo.com , **CIN:** L22100DL1983PLC314401**BUCKINGHAM INDUSTRIES LIMITED****CIN:** L22100DL1983PLC314401**Notes to Financial Statements for the year ended March 31,
2023****(Amount in thousands)****3. Financial Assets - Non current : Loans**

Particulars	31.03.2023	31.03.2022
Unsecured, considered good		
Akanksha Contracts Pvt Ltd	24,309.18	27,702.99
TOTAL	24,309.18	27,702.99

4. Deffered Tax Assets (Net)

Particulars	31.03.2023	31.03.2022
Deffered Tax Assets	2.00	431.16
TOTAL	2.00	431.16

5. Financial Assets - Current : Trade Receivables

Particulars	31.03.2023	31.03.2022
Unsecured, considered good	99,008.86	9,001.18
TOTAL	99,008.86	9,001.18

Trade Receivable Ageing Schedule

Particulars	31.03.2023	31.03.2022
(i) Undisputed Trade receivables (considered good)		
Less than 6 months	79,985.91	9,001.18
6 months - 1 year	19,022.95	0.00
1-2 years	-	-
2-3 years	-	-
More than 3 years	-	-

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Total	99,008.86	9,001.18
(ii) Undisputed Trade Receivables (considered doubtful)		
6 months - 1 year	-	-
1-2 years	-	-
2-3 years	-	-
More than 3 years	-	-
Total	-	-
(iii) Disputed Trade Receivables considered good		
6 months - 1 year	-	-
1-2 years	-	-
2-3 years	-	-
More than 3 years	-	-
Total	-	-
(iv) Disputed Trade Receivables considered doubtful		
6 months - 1 year	-	-
1-2 years	-	-
2-3 years	-	-
More than 3 years	-	-
Total	-	-
	-	-
Less: Provision for doubtful receivables		
Total Trade Receivable	99,008.86	9,001.18

6. Financial Assets - Current : Cash and cash equivalents

Particulars	31.03.2023	31.03.2022
Balance with banks		
ICICI bank- Noida	4,062.86	65.00
PNB-145806	375.92	577.75
PNB-145879	33.49	33.49
Total	4,472.27	676.24
Cash in hand		

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Cash in hand	6.39	6.39
Total	6.39	6.39
Other		
Fixed Deposit	76.20	-
Total	76.20	-
TOTAL	4,554.86	682.63

7. Financial Assets - Current : Loans and Advances

Particulars	31.03.2023	31.03.2022
Unsecured, considered good		
Chaser Financial Services Pvt Ltd	54,927.33	-
Hi-Tecno Enterprises LLP	6,868.20	-
PP Jewellers Pvt Ltd	15,483.04	-
SECUROCROP SECURITIES INDIA PVT. LTD.	10,000.00	-
Shilpi Arora	5,400.00	-
Virtu Exhibites Pvt. Ltd	4,750.00	-
KDM Media Pvt Ltd	500.00	-
V.Kumar and Associates	-	45.08
	97,928.56	45.08

8. Other current assets

Particulars	31.03.2023	31.03.2022
Unsecured, considered good		
TDS Receivable	469.54	472.89
Prepaid Expenses	30.67	-
GST Input Tax Credit		-

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	193.92	
Advance to Suppliers	22,376.15	20,000.00
TOTAL	23,070.29	20,472.89

9. Share capital

Particulars	31.03.2023	31.03.2022
<u>Authorised</u>	-	
Equity shares 20000000 of par value Rs.10/- each (Previous Year 1100000 of par value Rs. 10/- each)	200,000.00	11,000.00
<u>Issued, subscribed and fully Paid up</u>	-	
Equity shares 16410625 of par value Rs.10/- each	164,106.25	2,450.00
TOTAL	164,106.25	2,450.00

(i) Reconciliation of the number of shares and amount outstanding

as at the beginning and at the end of the reporting

period :

Particulars	31.03.2023	31.03.2022
<u>EQUITY SHARES</u>	-	
Equity shares outstanding at the beginning (2,45,000 shares of Rs. 10/- each)	2,450.00	2,450.00
Add; Issued during the year (1,61,65,625 shares of Rs. 10/- each)	161,656.25	-
Less: Redeemed or bought back during the year	-	-
TOTAL	164,106.25	2,450.00

(ii) Details of shares held by each shareholder holding more than 5% shares

Particulars	31.03.2023	31.03.2022
<u>EQUITY SHARES</u>	-	No. of Shares (%)

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S. L. Gupta	-	72000 (29.39%)
KDM MEDIA PRIVATE Ltd	23,55,000 (14.35%)	-
SHARPLINE NETWORK PRIVATE Ltd	24,75,000(15.08%)	-
SHILPA GUPTA	8,25,000(5.03%)	-
SUBODH KUMAR NATH	8,59,375(5.24%)	-
MAYA NATH	8,59,375(5.24%)	-
ASHOK KUMAR SINGHAL	8,25,000(5.03%)	-
SUMAN LATA	8,25,000(5.03%)	-
VIKAS SINGLA	8,25,000(5.03%)	-
PADMA GUPTA	8,86,875 (5.40%)	-
Sukhvinder lal Gupta	10735625 (65.43%)	72000 (29.39%)

(iii) Details of shares held by Promoter

Particulars	31.03.2023	31.03.2022
<u>EQUITY SHARES</u>	No. of Shares	No. of Shares
S. L. Gupta	792000 (4.83%)	72000(29.39%)
Total	792000 (4.83%)	72000 (29.39%)
% change in shareholding	-24.56%	

11. Non Current Liabilities- Security

Particulars	31.03.2023	31.03.2022
Unsecured, considered good		
Eveningstar Promoters Pvt Ltd	500.00	500.00
Prerna News	500.00	500.00
TOTAL	1,000.00	1,000.00

12. Short term Borrowings

Particulars	31.03.2023	31.03.2022
Unsecured, considered good -Related Parties		
Sadhna Broadcast Limited	-	1,174.49
Sharpline Broadcast limited	-	25,535.70
Unsecured, considered good -Others		
Prabhatam Developers		-

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	6,000.00	-
Sadhna Communications Pvt Ltd	10,075.00	-
Sharp Eye Broadcasting Pvt Ltd	9,725.00	-
Sharpline Network Pvt Ltd	38,900.00	-
TOTAL	64,700.00	26,710.19

13. Other current liabilities

Particulars	31.03.2023	31.03.2022
Unsecured, considered good		
GST paid	-	458.04
Expenses payable	1,113.50	632.50
TOTAL	1,113.50	1,090.54

14. Financial Liabilities - Current : Payables

Particulars	31.03.2023	31.03.2022
Unsecured, considered good	8,396.77	414.50
TOTAL	8,396.77	414.50

Trade Payable Ageing Schedules

Particular	31.03.2023	31.03.2022
(i) MSME		
Less than 1 Yrs	-	-
1-2 Years	-	-
2-3 Years	-	-
More than 3 Yrs	-	-
Total	-	-
(ii) Others		
Less than 1 Yrs	8,396.77	414.50
1-2 Years	-	-
2-3 Years	-	-

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More than 3 Yrs	-	-
Total	8,396.77	414.50
(iii) Disputed Dues-MSME		
Less than 1 Yrs	-	-
1-2 Years	-	-
2-3 Years	-	-
More than 3 Yrs	-	-
Total	-	-
(iv) Disputed- Others		
Less than 1 Yrs	-	-
1-2 Years	-	-
2-3 Years	-	-
More than 3 Yrs	-	-
Total	-	-
Total Trade Payables	8,396.77	414.50

15. Provisions

Particulars	31.03.2023	31.03.2022
Provision for Income Tax	773.92	437.11
TDS Payable	54.58	20.76
TOTAL	828.50	457.87

16. Revenue from Operations

Particulars	31.03.2023	31.03.2022
Sale of PVC	116,734.09	4,760
Commission Income	-	3,000.00
Event Assistance Service Income	-	3,302.30
Telecast Income	-	322.50
TOTAL		

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	116,734.09	11,384.80
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17. Purchases

Particulars	31.03.2023	31.03.2022
Purchases of PVC	112,632.36	4,692.00
Custom Duty and Social welfare surcharge	1,334.51	-
Freight inwards	2,307.88	-
Insurance cost	11.00	-
TOTAL	116,285.75	4,692.00

18. Other Income

Particulars	31.03.2023	31.03.2022
Interest Income		
Interest	4,241.07	2,447.77
Interest on I.T. Refund	1.59	-
Other non-operating income		
Foreign exchange difference income	235.33	-
Amount written off	39.46	-
Short and Excess	0.61	-
TOTAL	4,518.06	2,447.77

19. Employee benefits expense

Particulars	31.03.2023	31.03.2022
Salary Company Secretary	143.00	132.00
Remuneration to Director	480.00	480.00
TOTAL	623.00	612.00

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Particulars	31.03.2023	31.03.2022
AGM Meeting Expenses	1.00	4.69
Auditor Remuneration (See Annexure)	65.00	65.00
Amount written off	-	1,285.42
Bank charges	37.62	0.35
Connectivity charges	-	2.50
Postage expenses	16.32	0.83
Event Assistance Charges	-	2,889.97
Fees to MSEI Exchange	-	55.00
Filing Exp	-	5.20
Film Expenses	-	38.31
Flex Charges	-	456.91
Interest on IT	-	537.73
Interest on TDS	1.10	0.30
Interest paid	-	55.06
Interenal Audit fees	-	10.00
Legal expenses	-	19.00
NSDL Charges	-	26.32
Printing and stationery	77.20	29.40
Processing Charges	8.90	23.50
Professional expenses	571.28	316.00
Secretarial Audit Fees	-	15.00
Security expenses	-	5.20

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Short and Excess	-	0.16	
Telecast exp	-	300.00	
Travelling Expenses	-	11.33	
Website Charges	-	3.50	
ROC filing fees	824.00		-
Transportation EXp	52.84		-
Listing Exp	303.99		-
License Fees	0.33		-
Office Exp	5.37		-
Interest paid on NSDL	0.72		-
Fine on Custom duty	10.00		-
Foreign Remmittance charges	7.33		-
Import Cargo Charges	99.81		-
Interest on Custom Duty	7.38		-
TOTAL	2,090.18	6,156.68	

Excess/short provision relating earlier year tax

Particulars	31.03.2023	31.03.2022
Tax Adjusted for Earlier Years	268.60	-
Total	268.60	-

Other Expenses- Auditor's Remuneration

Particulars	31.03.2023	31.03.2022
Audit Fees	65.00	65.00
Total	65.00	65.00

21. Earnings per Share (EPS)

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(Amount in Rs.)

Particulars	31.03.2023	31.03.2022
Net profit/(loss) after tax for the year (in Rs.)	775,934.00	1,188,352.00
Weighted number of ordinary shares for basic EPS	2,569,851	245,000
Nominal value of ordinary share (in Rs. per share)	10	10
Basic and Diluted earnings for ordinary shares (in Rs. 10/- per share)	0.30	4.85

BUCKINGHAM INDUSTRIES LIMITED

CIN: L22100DL1983PLC314401

DEPRECIATION FOR THE YEAR ENDED 31.03.2023

2. Property, Plant and Equipments and Intangible Assets

(Amount in
thousands)

Particular	Useful Life (in Years)	Gross Block			Accumulated Depreciation			Net Block	
		01.04. 2022	Addition s/ Adjustm ents	31.03. 2023	01.04. 2022	Char ge for the year	31.03.202 3	31.03. 2023	31.03.2022
(A) Computers									
Computer	3.00	22.65	-	22.65	21.85	0.13	21.98	0.67	0.80
(B) Furniture & Fixtures									
Furniture & Fixture	10.00	47.00	-	47.00	28.00	4.92	32.92	14.08	19.00
(C) Office Equipments									
Mobile	5.00	9.50	-	9.50	8.24	0.57	8.81	0.69	1.26
Total		79.15	-	79.15	58.10	5.61	63.72	15.44	21.05
Total									

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Previous Year		79.15	-	79.15	50.44	7.67	58.10	21.05	
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General Notes :

1. No depreciation if remaining useful life is negative or zero.
2. If asset is used less than 365 days during current financial year then depreciation is equals to w.d.v as on 31-03-2023 less residual value.
3. Depreciation is calculated on pro-rata basis in case asset is purchased/sold during current F.Y.
4. If above assets is used for any time during the year for double shift, the depreciation will increase by 50% for that period and in case of the triple shift the depreciation shall be calculated on the basis of 100% for that period.