



HERCULES HOISTS LIMITED

Ref: KSM/CM6

Date: 26-05-2021

Listing Department
The Bombay Stock Exchange Limited,
Phiroze jeejeebhoy Towers
Dalal Street, Mumbai- 400023
[Scrip Code- 505720]

Listing Department,
National Stock Exchange of India Limited
Exchange Plaza,
Bandra-Kurla Complex,
Bandra (East), Mumbai-400051
[Scrip Code HERCULES EQ]

Sub.: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2021

Dear Sir/Madam

In compliance with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019 ("SEBI Circular"), please find enclosed the Annual Secretarial Compliance Report for the financial year ended March 31, 2021 .

We request you to take the above on record and that the same be treated as compliance under the applicable provisions of the SEBI Circular.

Thanking you,

For Hercules Hoists Limited,

Kiran Mukadam
Company Secretary

Encl: As Above

Corporate Office
501 to 504, Shelton Cubix
Sector 15, Plot No. 87
CBD Belapur, New Mumbai 400614
Maharashtra INDIA

T: +91 022 45717300/01
E: indef@indef.com
U: www.indef.com
Works: Khalapur & Pune

Registered Office
Bajaj Bhawan, 2nd Floor
226, Jammalal Bajaj Marg
Mumbai 400 021, INDIA
CIN: L45400MH1962PLC012385





S. N. ANANTHASUBRAMANIAN & CO
Company Secretaries

10/25-26, 2nd Floor, Brindaban,
Thane (W) - 400 601
T: +91 22 25345648 | +91 22 25432704
E: snaco@snaco.net | W: www.snaco.net
ICSI Unique Code: P1991MH040400

To,

Hercules Hoists Limited

CIN: L45400MH1962PLC012385

Bajaj Bhawan, 2nd Floor, 226,

Jamnallal Bajaj Marg,

Nariman Point Mumbai – 400 021.

Sir/ Madam,

Annual Secretarial Compliance Report for the Financial Year 2020 – 2021

We have been engaged by **Hercules Hoists Limited** (hereinafter referred to as 'the Company / Listed Entity') bearing CIN: **L45400MH1962PLC012385** whose equity shares are listed on National Stock Exchange of India Limited (Symbol: Hercules) and BSE Limited (Security Code: 505720) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued thereunder from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.





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Due to the pandemic caused by Covid-19 and prevailing lockdowns/restrictions on movement of people imposed by the Government, for the purpose of issuing this report, we have conducted our audit remotely based on the records and information made available to us by the Company, electronically.

The Annual Secretarial Compliance Report in the prescribed format is enclosed.



Malati Kumar

Partner

ACS : 15508 | COP: 10980

24th May, 2021 | Thane



**SECRETARIAL COMPLIANCE REPORT
OF HERCULES HOISTS LIMITED
FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2021**

We have examined:

- (a) all the documents and records made available to us and explanations provided by **Hercules Hoists Limited** ('the listed entity');
- (b) filings/ submissions made by the listed entity to the stock exchanges;
- (c) website of the listed entity;
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification;

for the financial year ended **31st March, 2021** ('Review Period'), in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the Regulations, circulars, guidelines issued there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ('SCRA'), rules made there under and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ('SEBI').

The specific Regulations, provisions of which have been examined, include:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - **Not applicable as there was no reportable event during the financial year under review;**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;





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- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 – **Not applicable as there was no reportable event during the financial year under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 – **Not applicable as there was no reportable event during the financial year under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 – **Not applicable as there was no reportable event during the financial year under review;**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 – **Not applicable as there was no reportable event during the financial year under review;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and Circulars/ Guidelines issued thereunder;

Based on the above examination, we hereby report that, during the review period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under except in respect of matter specified below:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 34(1) of SEBI (Listing Obligations and Disclosures Requirement) Regulation, 2015 Copy of Annual Report along with Notice should be submitted to Stock Exchanges not later than the	The Company commenced dispatch of Annual Report to its shareholders on 18 th August, 2020 and submitted the copy of the same to the Stock Exchanges on 21 st August, 2020 with delay of 2 days.	Both the dispatch of Annual Report to Shareholders and submission to the Stock Exchanges are well within the time limit of 21days as provided in the Regulations.





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	day of commencement of dispatch to the shareholders.		
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(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records;

(c) Following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under:

Sr. No.	Action taken by	Details of violation	Details of action taken [E.g.: fines, warning letter, debarment etc.,]	Observations/ Remarks of the Practicing Company Secretary, if any
1.	NSE/ BSE	Regulation 34(1) of SEBI (Listing Obligations and Disclosures Requirement) Regulation, 2015 mandates that a copy of Annual Report along with Notice of AGM should be submitted to the Stock Exchanges not later than the day of commencement of dispatch to the shareholders. The Company	Fine of Rs. 4,000/- levied by BSE Limited vide e-mail dated 8 th January, 2021 for delay of two days in submission of the Annual Report within the period prescribed under the said Regulation. NSE vide its e-mail dated 29 th December, 2020, has sought clarification on delay in submission under Regulation 34(1) and compliance with	The Company has sought wavier from payment of fine on 11 th January, 2021 to BSE and has also created waiver request on NSE portal on the same day. NSE has sought proof of dispatch of Annual Report which has been submitted by the Company. It is observed that





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		commenced the dispatch of annual report to shareholders on 18 th August, 2020 and submitted the copy of annual report to the Stock Exchanges on 21 st August, 2020, with a delay of 2 days.	Regulation 36(2) pertaining to sending of Annual Report referred to in sub-regulation 34(1), to the holders of securities, not less than twenty-one days before the annual general meeting.	both the dispatch of Annual Report to Shareholders and submission to the Stock Exchanges are well within the time limit of 21days as provided in the Regulations. The Company is awaiting the decision on the application for waiver.
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports – **Not Applicable since there was no observation in the previous Report and accordingly no action was required to be taken by the Company.**

For S. N. ANANTHASUBRAMANIAN & Co.
Company Secretaries

ICSI Unique Code P1991MH040400

Peer Review Cert. No.: 606/2019



Malati Kumar

Partner

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ICSI UDIN : A015508C000361139

24th May, 2021 | Thane