

Date: 27th May, 2022

To

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| <p>Manager, National Stock Exchange of India Limited Exchange Plaza, Plot No. C/1, G Block, Bandra Kurla Complex- Bandra (E), Mumbai-400051</p> <p>NSE Symbol: HITECH</p> | <p>Listing Department, BSE Limited Phiroze Jeejeebhoy Towers, Rotunda Building, Dalal Street, Fort Mumbai- 400001</p> <p>Scrip Code: 543411</p> |
|---|---|

Subject: Annual Secretarial Compliance Report for the year ended on March 31, 2022

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report for the year ended on March 31, 2022 issued by NSP & Associates, Practicing Company Secretary.

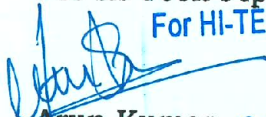
We request you to kindly take the same on record.

Thanking You,

Yours Faithfully

Thanking You,

For Hi-Tech Pipes Limited
For HI-TECH PIPES LIMITED


Arun Kumar Company Secretary
Company Secretary &
Compliance Officer



Secretarial Compliance report of
Hi-Tech Pipes Ltd. (CIN: L27202DL1985PLC019750) for the year ended on 31st March, 2022
(Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosures Requirement)
Regulations 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated
February 08, 2019)

I, Naveen Shree Pandey, Proprietor of NSP & Associates, have examined:

- a) all the documents and records made available to us and explanation provided by HI-Tech Pipes Ltd. (CIN: L27202DL1985PLC019750) ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) other document(s)/ filing(s), as may be relevant, which has been relied upon to make this certification;

for the year ended 31st March, 2022 ("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 thereunder; and
- b) the Securities Contracts (Regulation) Act, 1955 ("SCRA"), Rules, made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");
- c) the following Regulations prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the circulars/guidelines issued thereunder, have been examined:
 - i. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - ii. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
 - iii. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - iv. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - *Not Applicable to the Company during the period under review;*
 - v. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - *Not Applicable to the Company during the period under review;*
 - vi. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *Not Applicable to the Company during the period under review;*
 - vii. Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2021 - *Not Applicable to the Company during the period under review;*
 - viii. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - ix. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of COVID-19 pandemic, 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 thereunder, except in respect of matters specified below:

| Sr. No. | Compliance Requirement (Regulations/ guidelines specific clause) | Requirements circulars / including | Deviations | Observations / Remarks of the Practicing Company Secretary |
|---------|--|------------------------------------|------------|--|
| 1. | Nil | | | |

- 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 my examination of those records.
- c) The 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 thereunder:

| 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 |
|---------|-----------------|----------------------|---|--|
| 1. | Nil | | | |

- d) The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable.
- e) I further report that since there was no event of appointment/re-appointment/ resignation of Statutory Auditor of the Listed Entity during the review period, therefore the compliance under Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 is not applicable for review period.

For NSP & Associates
Company Secretaries

For NSP AND ASSOCIATES
N.S. Pandey
Proprietor

Naveen Shree Pandey
(Proprietor)
FCS No.: 9028
C P No.: 10937
UDIN: F009028D000320515

Place: Ghaziabad
Date: 14th May, 2022