

## HERCULES HOISTS LIMITED

Ref: KSM/CM6

Date: May 26, 2022

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, 2022

Dear Sir/Madam,

Pursuant to the provisions of Regulation 24A (2) of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations ("SEBI Regulations"), 2015, we enclose herewith annual secretarial compliance report of the Company, for the year ended March 31, 2022, as issued by M/s. S N Ananthasubramaniam & Co., Practicing Company Secretaries.

Please take the same on your record.

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 45417300/01  
E: indef@indef.com  
U: www.indef.com  
Works: Khalapur & Pune

**Registered Office**  
Bajaj Bhawan, 2<sup>nd</sup> 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](mailto:snaco@snaco.net) | W: [www.snaco.net](http://www.snaco.net)  
ICSI Unique Code: P1991MH040400

To,

The Board of Directors  
**Hercules Hoists Limited**  
CIN: **L45400MH1962PLC012385**  
Bajaj Bhawan, 2<sup>nd</sup> Floor, 226,  
Jamnalal Bajaj Marg,  
Nariman Point Mumbai – 400 021

Sir/ Madam,

**Annual Secretarial Compliance Report for the Financial Year 2021-22**

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 08<sup>th</sup> 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.

The Annual Secretarial Compliance Report in the prescribed format is enclosed

*Malati A. Kumar*

**Malati Kumar**  
**Partner**

**ACS : 15508 | COP: 10980**



**13<sup>th</sup> May, 2022 | Thane**



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**ANNUAL SECRETARIAL COMPLIANCE REPORT  
OF HERCULES HOISTS LIMITED  
FOR THE FINANCIAL YEAR ENDED 31<sup>st</sup> MARCH, 2022**

We have examined:

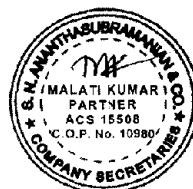
- (a) All the documents and records made available to us and explanations provided by **Hercules Hoists Limited** ('the listed entity');
- (b) Filings/ submissions made by the listed entity to the stock exchanges;
- (c) Website of the listed entity;
- (d) Any other document/ filing, as may be relevant,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

for the financial year ended **31<sup>st</sup> 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 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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**Company Secretaries**

- (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) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (up to 12<sup>th</sup> August, 2021) & The Securities and Exchange Board of India (Share Based Employee Benefits & Sweat Equity) Regulations, 2021 (with effect from 13<sup>th</sup> August, 2021)– **Not applicable as there was no reportable event during the financial year under review;**
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (up to 15<sup>th</sup> August, 2021) & The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021(with effect from 16<sup>th</sup> August, 2021) - **Not Applicable as the Company has not issued and listed any debt securities 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.	<b>Regulation 7(2) (b) of SEBI (Prohibition of Insider Trading) Regulations, 2015</b> Every company shall notify the particulars of securities acquired or disposed of by promoters to the Stock Exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information, where the transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified..	The transaction entered into by the promoters Mr. Kumud Bajaj and Mr. Madhur Bajaj was intimated to the Company within the prescribed time. Intimation of such particulars from Company to Stock Exchange to be made within 2 days was made on the 7 <sup>th</sup> day of the transaction.	Delay of 5 days in intimation to Stock exchange by Company for the transaction under Regulation 7(2) (a) of SEBI (Prohibition of Insider Trading) Regulations, 2015 



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**Company Secretaries**

- (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	NIL	NIL	NIL

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 A. Kumar*



Malati Kumar  
Partner  
ACS : 15508  
COP No. : 10980  
ICSI UDIN : A015508D000315819

13<sup>th</sup> May, 2022  
Thane