



May 29, 2019

BSE Limited
Corporate Relation Department
1st Floor, New Trading Ring
Rotunga Building Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai - 400 001
Stock code: 534328

National Stock Exchange of India Limited,
Listing Department,
Exchange Plaza,
Bandra Kurla Complex
Bandra (East)
Mumbai – 400 051
Stock code: HEXATRADEX

Sub. : Annual Secretarial Compliance Report for the Financial Year 2018-19

Dear Sirs,

This is with reference to the provisions 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 8th February, 2019. Please find attached Annual Secretarial Compliance Report of the Company for the Financial Year 2018-19 issued by M/s Awanish Dwivedi & Associates, Company Secretaries.

This is for your information and record please.

Thanking you,

Yours faithfully,
For HEXA TRADEX LIMITED,



Pravesh Srivastava
Company Secretary
ACS- 20993

Encl.: as above

Hexa Tradex Limited | www.hexatradex.com

Jindal Centre, 12, Bhikaiji Cama Place, New Delhi-110066, Phone-+91(11) 26188360-74, Fax:- +91(11) 26170691
Regd. Office: A-1, UPSIDC, Indl. Area, Nandgaon Road, Kosi Kalan, Distt. Mathura (U.P.) – 281403

CIN : L51101UP2010PLCO42382



**AWANISH
DWIVEDI & ASSOCIATES**
COMPANY SECRETARIES

A-62, Basement, Defence Colony, New Delhi - 110024
Tel. : 011- 46074119, +91 9871415344

**Secretarial Compliance Report of Hexa Tradex Limited for the year ended on 31st day
of March, 2019**

We, Awanish Dwivedi & Associates, a firm of practicing Company Secretaries, have examined:

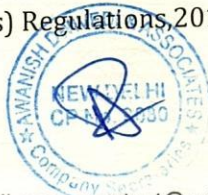
- a) all the documents and records made available to us and explanation provided by Hexa Tradex Limited ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the BSE Limited and National Stock Exchange of India Limited (hereinafter to be referred as "Stock Exchanges")
- c) 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 year ended 31st day of March, 2019 ("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, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, 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;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;



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h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015:

and circulars/ guidelines issued thereunder;

and based on the above examination, We hereby report that, during the Review Period :

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 / circulars / guideline including specific clause	Deviations	Observations/Remarks of the Practicing Company Secretary
1	Regulation 19(1)/(2) : SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 Nomination and remuneration committee.	The Chairperson of Company and the Chairperson of Nomination and Remuneration Committee were same personnel. As per Regulation 19: Chairperson of the listed entity, whether executive or non-executive, may be appointed as a member of the Nomination and Remuneration Committee and shall not chair such Committee.	The Company was required to appoint separate Chairpersons for the Company and for the Nomination and Remuneration committee as per requirement of Regulation 19 and rectified later on.

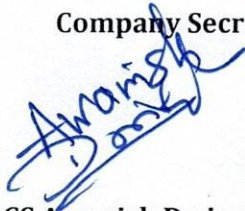
a) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.



- b) 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, if any
1	BSE Limited	Regulation 19 Non-Compliance with the constitution of Nomination and Remuneration committee.	Fine Amount 217120/-	Fine has been imposed by BSE and timely paid by the Company.
2	National Stock Exchange of India Limited	Regulation 19 Non-Compliance with the constitution of Nomination and Remuneration committee.	Fine Amount 217120/-	Fine has been imposed by NSE and timely paid by the Company

- c) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable for the year ended on 31st March, 2019, being the first year of its applicability on the listed entity.

Place: New Delhi Date: 28/5/2019	For Awanish Dwivedi & Associates Company Secretaries  CS Awanish Dwivedi FCS- 8055 , COP No.-9080
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