

Natura Hue Chem Limited

Registered Office: 501, Wallfort Ozone, Fafadih, Raipur (Chhattisgarh) 492001
[CIN NO: L24117CTI995PLC009845]

29th May, 2020

BY LISTING PORTAL

Department of Corporate Services,
Bombay Stock Exchange Ltd
P. J. Towers, 25th Floor,
Dalal Street,
Mumbai (Maharashtra) 400 001

Dear Sir/Madam,

SUBMISSION IN TERMS OF REGULATION 24 (A) SEBI (LODR) REGULATION, 2015

We are submitting herewith **Annual Secretarial Compliance Report** for the financial year 2019-20 received by us from the auditor in terms of above mentioned regulation.

Kindly take the submission on records and acknowledge the same.

Yours faithfully,
For, Natura Hue Chem Limited



(Sheela Agrawal)
Company Secretary & Compliance Officer

TELE: 09893126091, 0771-4048130

Email: satishbatra40@yahoo.co.in

SATISH BATRA & ASSOCIATES LLP

COMPANY SECRETARIES

2nd floor Ashoka Plaza, Ashoka Ratan,
Vidhan Sabha Marg, Shankar Nagar,
Raipur 492007 (C.G.)

To
The Board of Directors,
Natura Hue-Chem Limited,
501, Wallfort Ozone, Fafadih,
Raipur (C.G.) 492001

Dear Sir,



ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR 2019-20

We have been engaged by **Natura Hue-Chem Limited** (hereinafter referred to as 'the Company') bearing **CIN: L24117CT1995PLC009845** whose equity shares are listed on **Bombay Stock Exchange Limited (Security Code: 531834)** to conduct an audit in terms of Regulations 24A of Securities Exchange Board of India (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 circular/ 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 circular/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance note on Annual Secretarial 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. Annual Secretarial Compliance Report is enclosed.



(Satish Kumar Batra)
CP No.: 2875
FCS No.:1316

Date: 19th May, 2020

Place: Raipur

UDIN: F001316B0C0254734

SATISH BATRA & ASSOCIATES LLP
COMPANY SECRETARIES

2nd floor, Ashoka Plaza, Ashoka Ratan,
Vidhan Sabha Marg, Shankar Nagar,
Raipur 492007 (C. G.)

SECRETARIAL COMPLIANCE REPORT

OF

NATURA HUE-CHEM LIMITED (CIN: L24117CT1995PLC009845)

FOR THE YEAR ENDED 31st MARCH, 2020

We have examined:

- (a) all the documents and records made available to us and explanation provided by **Natura Hue-Chem Limited** ("the listed entity"),
- (b) the 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 year ended 31st March, 2020 ("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, 1953 ("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; **[There was no reportable event during the period under review];**
- (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;



[There was no reportable event during the period under review];

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **[There was no reportable event during the period under review];**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **[Not Applicable as the Company has not issued any debt securities];**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **[Not Applicable as the Company has not issued any Non- Convertible and Redeemable Preference Shares];**
- (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:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder,
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our 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, if any. |
|---------|-----------------------------|--|---|--|
| 1. | Bombay Stock Exchange (BSE) | Regulation 6(1) of SEBI (LODR) Regulations, 2015. Non compliance with requirement to appoint a qualified Company Secretary as the Compliance Officer for the quarter ended on June, 2019. | The Bombay Stock Exchange has imposed fine of Rs 11,800 (Basic fine of Rs.10,000 plus Rs.1,180 as GST). | Due to the sudden demise of CS Arun Jain there is a vacancy in the Company for the said period. The Company has duly paid the fine of Rs 11,800/- to BSE. |



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|----|-----------------------------|--|--|--|
| | | There as a delay of 10 days in the first quarter. | | |
| 2. | Bombay Stock Exchange (BSE) | Regulation 6(1) of SEBI (LODR) Regulations, 2015. Non compliance with requirement to appoint a qualified Company Secretary as the Compliance Officer for the quarter ended September, 2019. There as a delay of 63 days in the second quarter. | The Bombay Stock Exchange has imposed fine of Rs 74,340 (Basic fine of Rs.63,000 plus Rs.11,340 as GST). | In view of the same the Company has appointed CS Sneha Agrawal as Company Secretary cum Compliance Officer on 02/09/2019, Hence there was a total delay of 63 days in the second quarter. The Company has duly paid the fine of Rs 74,340/- to BSE. |

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

| Sr. No. | Observations of Practising Company Secretary | Observations made in Secretarial Compliance Report for the year ended on 31.03.2019 | Details of action taken by listed entity/ (if any) | Comments of Practising Company Secretary, on actions taken by listed entity |
|---------|--|---|--|---|
| | NA | NA | NA | NA |

NOTE:

There was no physical search made by us while preparing this report due to the ongoing lockdown imposed to prevent the spread of pandemic COVID-19 virus but the Company has provided a online support for preparing this report and we have verified the documents online and also kept the same for our records.

I hereby affirm that this report is being issued after an online search and verification of all documents and records of the Company.

For Satish Batra & Associates LLP
Company Secretaries



Satish Kumar Batra
Satish Kumar Batra
Designated Partner
FCS No.: 1316
C P No.: 2875
LDIN: F001316B000254734

Place: Raipur
Date: 19th May, 2020