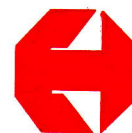


**Hindustan
Everest Tools
Limited**



Dohil Chambers, 46 Nehru Place
New Delhi-110 019 (INDIA)
Ph. : 91-11-46692600, Fax : 011-41606788
E-mail : ho@everesttools.com
CIN : L74899DL1962PLC003634

011-46579476

Date: 27th July, 2020

To,
The Manager (Listing)
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Kala Ghoda Fort,
Mumbai, Maharashtra- 400001

**Subject: Submission of Annual Secretarial Compliance Report for the
financial year ended 31st March, 2020**

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith Annual Secretarial Compliance Report for the financial year ended on 31st March, 2020, issued by Pradip Kumar Muduli, Practicing Company Secretary, New Delhi.

Kindly take the above information in your records.

Thanking you,

Yours faithfully,

For Hindustan Everest Tools Limited

**Sonam Gupta
Company Secretary**

To,
Hindustan Everest Tools Limited,
Dohil Chambers 4th Floor
46 Nehru Place
New Delhi, 110019

Secretarial compliance report of Hindustan Everest Tools Limited (CIN: L74899DL1962PLC003634) for the Financial year ended 31st March, 2020.

I Pradip Kumar Muduli, Practicing Company Secretary have examined:

- (a) all the documents and records made available to me and explanation provided by Hindustan Everest Tools 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, 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; Not attracted during the period under review.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;) Not attracted during the period under review.
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not attracted during the period under review.
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not attracted during the period under review.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; Not attracted during the period under review.
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993; Not attracted during the period under review; and circulars/ guidelines issued thereunder;

and based on the above examination, I 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/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 23(9) SEBI (LODR) - Disclosure Of Related Party transactions for the Half Year ended 31 st March 2019 & for Half Year ended September 30, 2019 to BSE.	Related Party transactions for the Half Year ended 31 st March 2019 was not informed to BSE & for Half Year ended September 30, 2019 there was delay of 8 days in informing BSE.	As informed by the management this being the first year of implanting the Regulation 23(9) SEBI (LODR) and besides payment of managerial remuneration and rent there was no other transactions of related party, hence, there was deviation in informing BSE.

(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: NIL

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.
	During the year under report no action was taken.			

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31/03/2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Though the Company has intimated about the Stock Exchange as required in respect of Board Meetings held in May 2018 and August 2018 but it has not published the notices convening the said Board Meetings.	The Company has not published notice convening Board Meetings held in May 2018 and August 2018, in news papers as required under Regulation 47 of listing agreement/ Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015	Company has taken care of publishing the notice convening Board Meetings in F.Y.2019-20.	Company has taken care of publishing the notice convening Board Meetings in F.Y.2019-20.




Place: New Delhi
Date : 23/07/2020

Name : Pradip Kumar Muduli
FCS No.:6170, CP :5730 UDIN: **F006170B000493791**