

June 25, 2020

To,
**Corporate Relations
BSE Limited**
Phiroze Jeejeebhoy Towers, Dalal
Street,
Mumbai-4000 01
(Security Code: 534615)

**The Manager (Listing Department)
National Stock Exchange of India
Limited**
Exchange Plaza, C-1, Block G, Bandra
Kurla Complex, Bandra (E)
Mumbai — 400 051
(Symbol: NECCLTD)

Subject: Annual Secretarial Compliance Report for the financial year ended March 31, 2020.

Dear Sir(s),

In Compliance with SEBI Circular No.: CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed copy of Annual Secretarial Compliance report dated June 23, 2020 for the financial year 2019-20 issued by A.K. Friends & Co., Practicing Company Secretary and Secretarial Auditor of the Company

This is for your information and record. We request you to kindly take the same on your records.

Thanking you,

Yours faithfully,
For North Eastern Carrying Corporation Limited

**Sd/-
(Mamta Bisht)
Company Secretary & Compliance Officer**



A. K. FRIENDS & CO.
Company Secretaries

E-38, 2nd Floor, Behind Hira Sweets, Laxmi Nagar,
Delhi -110092, INDIA, Tel.: (0) +91-11-43601839
Mob. : +91-92120 00759,99110 00759
E-mail: akfriends38@yahoo.co.in

**SECRETARIAL COMPLIANCE REPORT OF NORTH EASTERN CARRYING CORPORATION
LIMITED FOR THE YEAR ENDED 31st MARCH, 2020**

To,
The Board of Directors,
North Eastern Carrying Corporation Limited
9062/47, Ram Bagh Road, Azad Market,
Delhi-110006

I have examined:

(a) all the documents and records made available to us and explanation provided by **North Eastern Carrying Corporation Limited (CIN: L51909DL1984PLC019485)** ("the listed entity"),

(b) the filings/ submissions made by the listed entity to the stock exchanges,

(c) website of the listed entity,

(d) all other document/filing, as may be relevant, which has been relied upon to make this certification, for the financial year ended 31st March, 2020 ("Review Period") in respect of compliance with the provisions of:

(i) the Securities and Exchange Board of India Act, 1992("SEBI Act") and the Regulations, circulars, guidelines issued there under; and

(ii) 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, 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; **(Not applicable as the Company has not issued any further share capital during the review period);**
- (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 applicable as the Company has not brought back/proposed to buyback any of its securities during the review period) :**



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not applicable as the Company has not issued any shares to its employees during the review period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not applicable as the Company has not issued and listed debt securities during the review period);**
- (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 and listed any Non- Convertible and Redeemable Preference Shares during the review period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and the circulars and guidelines issued thereunder;
- (i) Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018;
- (j) Other regulations as applicable to the Company 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 Observations/ (Regulations/ circulars/ Remarks of the guidelines including specific Practicing clause) | Deviations | Observations/ Remarks of the Practicing Company Secretary |
|---------|---|------------|---|
| NA | | | |

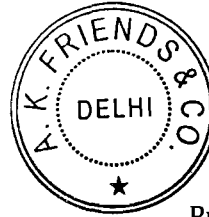
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ 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, if any. |
|---------|-----------------|----------------------|---|--|
| NA | | | | |

- (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 st March, 2020 | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|--|--|--|
| NA | | | | |



For A. K. Friends & Co.

Ashish Kumar Friends

(Ashish Kumar Friends)
Practicing Company Secretary
CP No.:4056
Membership No.: FCS 5129

Place: Delhi
Date: 23/06/2020
UDIN : F005129B000367667