



## HINDUSTAN COMPOSITES LTD.

Peninsula Business Park, Tower "A", 8th Floor,  
Senapati Bapat Marg, Lower Parel, Mumbai - 400 013.  
Tel.: (91) (22) 6688 0100 • Fax : (91) (22) 6688 0105  
E-mail : hcl@hindcompo.com  
Website : www.hindcompo.com  
CIN No. L29120MH1964PLC012955

29<sup>th</sup> May, 2019

To  
The Manager  
Department of Corporate Services  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai- 400 001  
Scrip Code: 509635

The Manager - Listing  
National Stock Exchange of India  
Limited  
Exchange Plaza, 5<sup>th</sup> Floor, 'G' Block  
Bandra Kurla Complex  
Bandra (East), Mumbai - 400 051  
SYMBOL: HINDCOMPOS

Dear Sir,

**Sub: Annual Secretarial Compliance Report pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")**

Pursuant to Regulation 24A of Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1/27 /2019 dated 8<sup>th</sup> February 2019; please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the Financial Year ended 31<sup>st</sup> March, 2019 issued by Mr. Manish Baldeva, Practicing Company Secretary.

Kindly take the same on your record.

Thanking you,

Yours faithfully,

For Hindustan Composites Limited

Vikram Soni  
Company Secretary & Compliance Officer  
Membership No. A36705



### Regional Sales Offices

---

East : 29, Ganesh Chandra Avenue, Bando House, Room No. 207, 2nd Floor, Kolkata - 700 013. • Tel.: 91-33-2236078 • Fax : 91-33-22360788

---

West : B-11, Paragon Condominium, 1st Floor, P. B. Marg, Worli, Mumbai - 400 013. • Tel.: 91-22-2495 1355 • Fax : 91-22-2495 1365

---

North : 401, Rohit House, 3 - Tolstoy Marg, New Delhi - 110 001 • Tel.: 91-11-2331 3845 • Fax : 91-11-23313846

---

South : New No. 931, Old No. 478, Ramaniyam Citadel Apartment, 2nd Floor, Poonamallee High Road, Arumbakkam, Chennai - 600 106. • Tel : 91-44-2363 3722

---



**SECRETARIAL COMPLIANCE REPORT OF HINDUSTAN COMPOSITES LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2019**

*[Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

We, M Baldeva Associates, have examined:

- (a) all the documents and records made available to us and explanation provided by Hindustan Composites Limited ("the listed entity");
- (b) the filings and submissions made by the listed entity to the stock exchanges viz., BSE Ltd.(Scrip Code: 509635) and National Stock Exchange of India Ltd.(symbol: HINDCOMPOS);
- (c) following websites:
  1. The listed entity i.e. www.hindcompo.com;
  2. The BSE Limited i.e. www.bseindia.com and
  3. The National Stock Exchange of India Ltd. i.e. www.nseindia.com
- (d) other documents or reports filed with the aforesaid stock exchanges from time to time.

for the year ended 31<sup>st</sup> 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 (not applicable 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 during the review period);
- (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; (not applicable 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 during the review period);





- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client; and
- (j) The Depositories Act, 1996 and the Regulations and Bye-laws framed 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, circulars and guidelines issued thereunder.
- (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) No action was taken against the Company, its promoters and directors either by SEBI or by aforesaid stock exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars), under the aforesaid Acts, Regulations and circulars or guidelines issued thereunder.
- (d) This being first financial year of the applicability of this report, reporting regarding the observation(s) of the Practicing Company Secretary in the previous secretarial compliance report or any action taken by the Company or any comment on the actions taken by the Company is not applicable.

Place : Thane  
Date: 6<sup>th</sup> May, 2019

For **M Baldeva Associates**  
Company Secretaries



**CS Manish Baldeva**  
Proprietor  
M. No. FCS 6180 C. P. No. 11062