

**Date: May 28, 2022**

To,  
BSE limited,  
Corporate Relationship Department  
25<sup>th</sup> floor, Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai 400001  
SCRIP Code: 543266

To,  
National Stock Exchange Of India Limited,  
Exchange Plaza, Plot no. C-1, Block G,  
Bandra Kurla Complex, Bandra (East)  
Mumbai 400051  
NSE Symbol: HERANBA

**Dear Sir,**

**Sub: Annual Secretarial Compliance Report for the financial year ended March 31, 2022**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 as amended from time to time, we are submitting herewith the Annual Secretarial Compliance Report issued by K C SUTHAR & Co., A Practicing Company Secretary (C.P. No. 4075), for the financial year ended March 31, 2022.

Please take the above information on record.

Thanking You,

Yours faithfully,

**For Heranba Industries Limited**

**Abdul Latif**  
**Company Secretary and Compliance Officer**  
ICSI Membership No.: A17009

Encl. as above



Annual Secretarial Compliance Report  
[Pursuant to requirements of regulation 24 A of the listing regulation]

Heranba Industries Limited  
For the year ended 31st March, 2022

I have examined:

- (a) All the documents and records made available to us and explanation provided by HERANBA INDUSTRIES 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 31<sup>st</sup> March, 2022 ("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:-

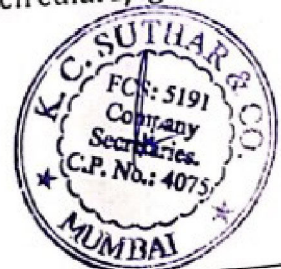
- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;



- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not applicable to the Listed Entity during review period)**
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the Listed Entity during review period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the Listed Entity during review period)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Listed Entity during review period)**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the Listed Entity during review period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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.
- 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/our examination of those records.
- c) The Following are the details of actions taken against the listed entity/ its promoters/ directors 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:



**Details of Complaints/ notices received by the company:**

Sr No.	Action taken by	Details of violation	Action taken by Company	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ Remarks of the Practicing Company Secretary
1	BSE Limited	Notice for non compliance with SEBI (LODR) Regulation 2015 (Listing Regulation) and Regulation 76 of SEBI (Depositories and Participants) Regulation 2018 (Depositories Regulations)- Non Compliance of Regulation -17 (1) of SEBI - LODR	The Company has appointed Woman Independent Director on the Board of the Company with effect from 11/11/2021 and accordingly complied with the provision of the said default	Ref No.: SOP-CReview-(21-Feb-2022)  Penalty imposed Rs. 2,41,900/- (including GST)	The Company paid the penalty and also requested the exchanges to waive the penalty, as the Company has already complied with the above default delayed was due to COVID-19 restrictions
2	National Stock Exchange of India Limited	Notice for non compliance with SEBI (LODR) Regulation 2015 (Listing Regulation) and Regulation 76 of SEBI (Depositories and Participants) Regulation 2018 (Depositories Regulations)- Non Compliance of Regulation -17 (1) of SEBI - LODR	The Company has appointed Woman Independent Director on the Board of the Company with effect from 11/11/2021 and accordingly complied with the provision of the said default	Notice No. NSE/LIST-SOP/COMB/FINES /0832 dt Feb, 21, 2022  Penalty imposed Rs. 2,41,900/- (including GST)	The Company paid the penalty and also requested the exchanges to waive the penalty, as the Company has already complied with the above default delayed was due to COVID-19 restrictions

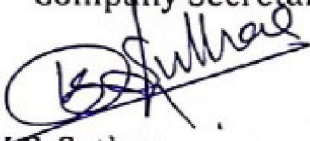
**Details Of Investors Complaints And Observations: [SCORE]**

Sr No.	No. of complaints received by the Company	Details of complaints	Action taken by Company	Present status of the Complaints	Observations/ Remarks of the Practicing Company Secretary
1	1. Directly by Company/ RTA: 3216 2. By Stock Exch. -6 3. By SEBI -15  Total - 3237	All complaints were related to IPO process- i.e. non receipts of Refund / shares credit in demat A/c or other related issues.	All complaints were resolved by the RTA as well as by the Company on time bound period.	At the end to the year, there was no any complaint pending with the company.	As per records and documents produced, all the complaints has been resolved by the Company.



- d) The listed entity has taken the following actions to comply with the observations made in previous reports: [No. observations were made in the previous report]

For K.C.Suthar & Co.  
Company Secretaries



K.C. Suthar

Prrietor

FCS: 5191 /COP: 4075

Peer Review No: 1357/2021

UDIN: F005191D000322717

DATE: 14/05/2022

PLACE: Mumbai

