

July 29, 2020

BSE Limited
Corporate Relation Department
1st Floor, New Trading Ring
Rotunga Building, Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400001

National Stock Exchange of India Ltd.
Listing Department
Exchange Plaza,
Bandra – Kurla Complex,
Bandra (East),
Mumbai-400051

**Stock Code - 534328** 

Stock Code - HEXATRADEX

Sub.: Annual Secretarial Compliance Report for the Financial Year 2019-20

Dear Sirs,

This is with reference to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019. Please find attached Annual Secretarial Compliance Report of the Company for the Financial Year 2019-20 issued by M/s Dwivedi & Associates, Company Secretaries.

This is for your information and record please.

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Thanking you,

Yours Faithfully,

For HEXA TRADEX LTD.,

Pravesh Srivastava Company Secretary

ACS: 20993

## Dwivedig **C**Associates

Company Secretaries

## Secretarial Compliance Report of Hexa Tradex Limited for the year ended on 31st day of March, 2020

We, Dwivedi & Associates, a firm of practicing Company Secretaries, have examined:

- a) all the documents and records made available to us and explanation provided by Hexa Tradex Limited ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the BSE Limited and National Stock Exchange of India Limited (hereinafter to be referred as "Stock Exchanges")
- 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 day of 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;
- 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;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- 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 insofar as it appears from our examination of those records.
- c) The listed entity is in the process of complying with the provisions of Clause 6(A) and 6(B) of the circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by Securities and Exchange Board of India.
- d) 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
N.A	N.A.	NIL	NIL	None

e) 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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	The Company was required to appoint separate Chairpersons for the Company and for the Nomination and Remuneration committee as per requirement of Regulation 19.	2019	The Company has duly appointed separate Chairperson for the company and for Nomination and Remuneration committee as per the requirement of Regulation 19 during the financial ended on 31st March, 2020.	Complied



FOR DWIVEDI & ASSOCIATES COMPANY SECRETARIES

> CS AWANISH DWIVEDI FCS- 8055, CP NO.- 9080

DIN: F008055B000509556

Place: New Delhi Date: 27 /07/2020

