



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

28th May, 2022

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, 5th Floor, 'G' Block
Bandra Kurla Complex
Bandra (East), Mumbai - 400 051
SYMBOL: HINDCOMPOS

Dear Sir/Madam,

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 8th February 2019; please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the Financial Year ended 31st March, 2022 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 : Peninsula Business Park, 'A' Tower, 8th Floor, Senapati Bapat Marg, Lower Parel, Mumbai - 400 013 India • Tel : 91-22-6688 0100 • Fax : 91-22- 6688 0105

**SECRETARIAL COMPLIANCE REPORT OF HINDUSTAN COMPOSITES LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2022**

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

I, CS Manish Baldeva, Proprietor, M/s. M Baldeva Associates, Companies Secretaries, Thane, have examined:

- (a) all the documents and records made available to me 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., the BSE Ltd. (Scrip Code:509635) and National Stock Exchange of India Limited (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 31st 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 ("Listing Regulations");
- (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 (Buy-back of Securities) Regulations, 2018 (not applicable during the review period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (not applicable during the review period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (not applicable during the review period);





- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013 and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (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 circulars / guidelines issued thereunder.

And based on my 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
NIL			

- (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 following is the detail of action taken against the listed entity/ its promoters/ directors/ material subsidiaries either by the SEBI or by the Stock Exchanges (including under the Standard Operating Procedures issued by the 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 eg. fines, warning letter, debarment, etc.	Observations/ Remarks of the Practicing Company Secretary, if any.
NIL				



(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

(e) There was no event of appointment/ re-appointment / resignation of statutory auditors of the Company during the review period. Further, terms of appointment of its existing auditors are in compliance with Para 6(A) and 6(B) of Circular No. CIR/CFD/CMD1/114/2019 dated 18th October 2019.

For M Baldeva Associates
 Company Secretaries




CS Manish Baldeva
 Proprietor

M. No. FCS 6180 C. P. No. 11062
 Peer Review No. 1436/2021

UDIN: F006180D000398033

Place: Thane
 Date: 26th May, 2022