

Date: 27th May, 2019

To,
The Manager (Listing)
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Kala Ghoda Fort,
Mumbai, Maharashtra- 400001

**Subject: Submission of Annual Secretarial Compliance Report for the
financial year ended 31st March, 2019**

Dear Sir/Madam,

Pursuant to Regulation 24A read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith Annual Secretarial Compliance Report for the financial year ended on 31st March, 2019, issued by Pradip Kumar Muduli, Practicing Company Secretary, New Delhi.

Kindly take the above information in your records.

Thanking you,

Yours faithfully,

For Hindustan Everest Tools Limited


Sonam Gupta
Company Secretary



To,
Hindustan Everest Tools Limited,
Dohil Chambers 4th Floor
46 Nehru Place
New Delhi, 110019

Secretarial compliance report of Hindustan Everest Tools Limited (CIN: L74899DL1962PLC003634) for the Financial year ended 31st March, 2019.

I Pradip Kumar Muduli, Practicing Company Secretary have examined:

- (a) all the documents and records made available to me and explanation provided by Hindustan Everest Tools 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 31st 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;
- (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 attracted during the period under review.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;) Not attracted during the period under review.
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not attracted during the period under review.
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not attracted during the period under review.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; Not attracted during the period under review.
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993; Not attracted during the period under review; 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 (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 47- The listed entity shall publish the following information in the newspaper: (a) notice of meeting of the board of directors where financial results shall be discussed	The Company has not published notice convening Board Meetings held in May 2018 and August 2018, in news papers as required under Regulation 47 of listing agreement/ Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015	Though the Company has intimated about the Stock Exchange as required in respect of Board Meetings held in May 2018 and August 2018 but it has not published the notices convening the said Board Meetings.

(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: NIL

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.
	During the year under report no action was taken.			

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

This being the first reporting since the notification of the requirements to submit the report, reporting on actions to comply with the observations made in the previous reports do not arise;



Place: New Delhi
Date : 27/05/2019

Name : Pradip Kumar Muduli
FCS No.:6170, CP :5730