

# HEMANG RESOURCES LIMITED

(Formerly Known as "Bhatia Industries & Infrastructure Limited")

CIN : L65922TN1993PLC101885

June 19, 2020

To,  
BSE Limited  
Department of Corporate Services  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai - 400001  
Fax No. 022 2272 2041

Scrip Code - 531178

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2020

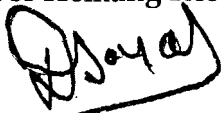
Dear Sir(s),

With reference to the SEBI circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclose Annual Secretarial Compliance Report duly signed by the Practicing Company Secretaries M/s Ajit Jain & Co. for the year ended March 31, 2020.

Kindly take note of the same and acknowledge the receipt.

Thanking You

Yours Faithfully,  
For Hemang Resources Limited



Dharmendra Soyal  
Company Secretary & Compliance Officer



**AJIT JAIN**



**AJIT JAIN & CO.**

M.Com, L.L.B. (Hons.), FCS

☎ : (Off. & Res.) : 0731-2497031, 4064510

Mobile : 94250-53710, E-mail : ajitjain84@gmail.com

**COMPANY SECRETARIES**

'PREM VILLA' 84, Kailash Park Colony,  
Near Geeta Bhawan, INDORE - 452 001

**SECRETARIAL COMPLIANCE REPORT  
FOR THE FINANCIAL YEAR ENDED 31 MARCH, 2020**

*[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

To,  
**Hemang Resources Limited**  
L65922TN1993PLC101885  
Plot No. 4, 6<sup>th</sup> Avenue, Harington Road,  
Chetpet, Chennai (TN) - 600031

I have conducted the Secretarial Compliance Audit of the applicable SEBI (Securities and Exchange Board of India) Regulations and the circulars/ guidelines issued thereunder for the Financial Year ended 31<sup>st</sup> March 2020 for Hemang Resources Limited ("the Company"). The audit was conducted in a manner that provided me a reasonable basis for evaluating the statutory compliances and expressing my opinion thereon.

I have examined:

- a) the documents and record made available to us and explanation provided by Hemang Resources Limited ("the listed entity"),
- b) The filings/submission made by the listed entity to stock exchanges,
- c) website of the listed entity
- d) any other documents/ filing as may be relevant, which has been relied upon to make this certification,

For the year ended 31<sup>st</sup> March, 2020 ("relevant 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 Contract (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 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 (Prohibition of Insider Trading) Regulations, 2015
- c) Securities and Exchange Board of India (Registrar to an issue and Share Transfer Agents) Regulations, 1993 regarding with the Companies Act and dealing with client.

As per the explanations given to me in the representation made by the management and relied upon by me, during the period under review, provision of the following regulations were not applicable to the Company:

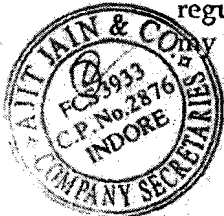
- a) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018
- b) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018
- c) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008
- d) Securities and Exchange Board of India (Substantial Acquisition of Share and Takeover) Regulations, 2011
- e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013
- f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014

and based on the above examination, I hereby report that, during the review period:

- a) The listed entity has complied with the provision of above regulations and circulars / guidelines issued thereunder except in respect of matter specified below:-

| S. No. | Compliance Requirement (regulation / circulars / guideline including specific clause) | Deviation | Observation / Remark of the Practicing Company Secretary |
|--------|---|-----------|--|
| Nil    |   |           |  |

- b) The listed entity has maintained proper records under the provisions of the above regulations and circulars/guideline issued thereunder in so far as it appears from my examinations of those records.



- c) The following are the details of action taken against the listed entity / its promoters / director / material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedure issued by SEBI through various circulars) under the aforesaid Act/ Regulations and circulars/guidelines issued thereunder:

| S. No. | Action taken by | Details of violation | of | Details of action taken e.g. fines, warning, letters, debarment etc. | Observation / Remark of the Practicing Company Secretary |
|--------|-----------------|----------------------|----|--|--|
| Nil    |                 |                      |    |  |  |

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

| S. No. | Observation of the Practicing Company Secretary in previous reports | Observation made in the secretarial compliance report for the year ended 31.03.2019 | Action taken by listed entity, if any. | Comments of the Practicing Company Secretary on the action taken by listed entity. |
|--------|---|---|--|--|
| Nil    |   |   |  |  |

For Ajit Jain & Co.  
Company Secretary

Place: Indore  
Date: June 17, 2020



*A. K. Jain*

Ajit Jain  
Proprietor

C.P. No. 2876; FCS No. 3933

UDIN F0039338000350224