

**HEMANG RESOURCES LIMITED**

(Formerly Bhatia Industries & Infrastructure Limited) CIN: L65922TN1993PLC101885  
Registered office: "BCC House", Plot No. 4, 6<sup>th</sup> Avenue, Harrington Road, Chetpet, Chennai-  
600031 (TN)  
Telephone: +91-44-45590050, 51 Fax: +91-44-45590057, Email:  
[chennai@bhatiacoalindia.com](mailto:chennai@bhatiacoalindia.com).

---

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

May 17, 2019

Scrip Code - 531178

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2019

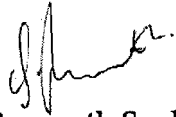
Dear Sir(s),

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, 2019.

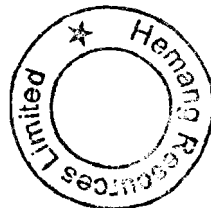
Kindly take note of the same and acknowledge the receipt.

Thanking You,

Yours faithfully,  
For Hemang Resources Limited



Premnath Sankar Rao  
Chief Financial Officer



## SECRETARIAL COMPLIANCE REPORT OF HEMANG RESOURCES LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2019

[Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019]

I have examined:

- (a) all the documents and records made available to us and explanation provided by **Hemang Resources 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,

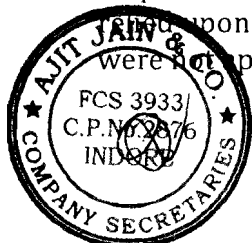
for the year ended 31<sup>st</sup> March, 2019 ("Review Period") in respect of compliance with the provisions of:

- (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 (Prohibition of Insider Trading) Regulations, 2015;
- (c) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client.

As per the explanations given to me in the representations made by the management and upon by me, during the period under review, provisions 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 (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (e) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

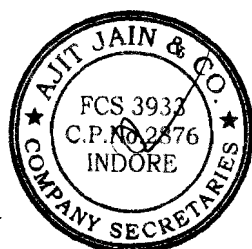
and based on the above examination, I hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

S.No.	Compliance Requirements (Regulations / circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
Not Applicable			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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:

S.No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letters, debarment etc.	Observations/ remarks of the Practicing Company Secretary, if any.
Not Applicable				

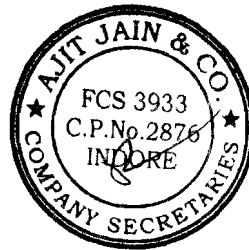


(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

S.No.	Observation of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2018	Actions taken by the listed entity, if any.	Comments of the Practicing Company Secretary on the actions taken by the listed entity.
Not Applicable*				

\*This being the first Compliance reporting since the notification of the requirements to submit the report, no action is required from the Listed Entity.

Place: Indore  
Date: May 15, 2019



For Ajit Jain & Co.,  
Company Secretaries

*A. K. Jain*

Ajit Jain  
Proprietor  
C.P. No. 2876; F.C.S. No. 3933