

HAP\SEC\14\2021-22

26-May-2021

BSE Limited
Corporate Relationship Department
2nd Floor, New Trading Ring,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001

National Stock Exchange of India Ltd
Exchange Plaza, 5th Floor,
Plot No. C/1, G Block,
Bandra Kurla Complex,
Bandra(E), Mumbai – 400 051

Stock Code: BSE: 531531
NSE: HATSUN

Dear Sir / Madam,

Subject: Annual Secretarial Compliance Report for the year ended 31st March, 2021

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we submit the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2021.

Kindly take the disclosure on record.

Thanking you,

Yours faithfully,
For Hatsun Agro Product Limited



G. Somasundaram
Company Secretary & Compliance Officer

Encl: As above

S Dhanapal & Associates

Practising Company Secretaries

Partners

S.Dhanapal, B.Com, BABL, FCS
N. Ramanathan, B.Com, F.C.S
Smita Chirimar, M.Com, F.C.S
R. Pratheepa, B.C.S., A.C.S

SECRETARIAL COMPLIANCE REPORT OF M/s. HATSUN AGRO PRODUCT LIMITED FOR THE YEAR ENDED 31.03.2021

We, S Dhanapal & Associates, a Firm of Practising Company Secretaries, Chennai, have examined:

- a) All the documents and records made available to us and explanation provided by M/s. HATSUN AGRO PRODUCT LIMITED (CIN: L15499TN1986PLC012747) ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity namely www.hap.in,
- d) other filing / documents such as email communications as relevant, which have been relied upon to make this certification,

for the year ended 31.03.2021 ("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 if applicable during the year, include:-

- a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 as substituted by Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 as substituted by Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - *Not Applicable*
- e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - *Not Applicable*

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- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - *Not Applicable*
- g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013- *Not Applicable*
- h) The 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, except in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising 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 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 Practising Company Secretary, if any.
NIL				

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96/104, Nungambakkam High Road
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Email Id:csdhanapal@gmail.com
Website:www.csdhanapal.com

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

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2019 & 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
Not applicable				

We further report that we have conducted entire verification of records only through online verification and examination of records, as requested and facilitated by the company, due to prevailing Covid situation for the purpose of issuing this Report.

Date: 26.5.2021

Place: Chennai

For M/s. S DHANAPAL & ASSOCIATES
(A Firm of Practising Company Secretaries)

N. RAMANATHAN

(Partner)

FCS 6665

CP No. 11084

UDIN : F006665C000371667