

July 28, 2020

To,  
**The BSE Limited**  
Corporate Relations Department,  
PhirozeJeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400001

**Scrip ID: HRYNSHP**  
**ISIN: INE400G01011**  
**Scrip code: 526931**

Sub: Annual Secretarial Compliance Report pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”) for the year ended March 31, 2020.

Ref: SEBI Circular- CIR/CFD/CMD1/27/2019 dated February 08, 2019

Dear Sir/Madam,

With reference to the captioned subject enclosed and in Compliance with SEBI Circular-CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed Annual Secretarial Compliance Report pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements Regulations, 2015 (“Regulations”) for the year ended March 31, 2020.

Kindly take the above disclosure on your record.

The above is for your information.

Thanking you

Yours faithfully,  
For **HARIYANA SHIP-BREAKERS LIMITED**

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**SHANTISARUP RENIWAL**  
**DIRECTOR**  
**DIN: 00040355**



ANNUAL SECRETARIAL COMPLIANCE REPORT  
OF  
HARIYANA SHIP-BREAKERS LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2020

To,  
The Board of Directors,  
**HARIYANA SHIP-BREAKERS LIMITED**  
156, Maker Chambers VI,  
220, Jamnalal Bajaj Marg,  
Nariman Point,  
Mumbai - 400021

We have conducted the Annual Secretarial Compliance Audit of **HARIYANA SHIP-BREAKERS LIMITED** (hereinafter referred to as "the Company") in terms of compliance with Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

We, have examined all the:

- a) documents and records made available to us and explanation provided by the Company;
  - b) the filings/ submissions made by the Company with the Stock Exchanges;
  - c) other relevant documents/ filings,
  - d) content on the website of the Company;
- for the year ended March 31, 2020 ("Review Period") in respect of compliance with the provisions of:
- a) the Securities and Exchange Board of India Act, 1992 and the Regulations, circulars, guidelines issued thereunder; and
  - b) the Securities Contracts (Regulation) Act, 1956, rules made thereunder and the Regulations, circulars, guidelines issued thereunder by SEBI.

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- a) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) SEBI (Prohibition of Insider Trading) Regulations, 2015;
- c) SEBI (Depositories and Participants) Regulations, 2018;
- d) SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Act and dealing with client;
- e) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018
- f) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- g) SEBI (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the Company during the Review Period).
- h) SEBI (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company during the Review Period)



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- i) SEBI (Buyback of Securities) Regulations, 2018 (Not applicable to the Company during the Review Period)
- j) SEBI (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (Not applicable to the Company during the Review Period).

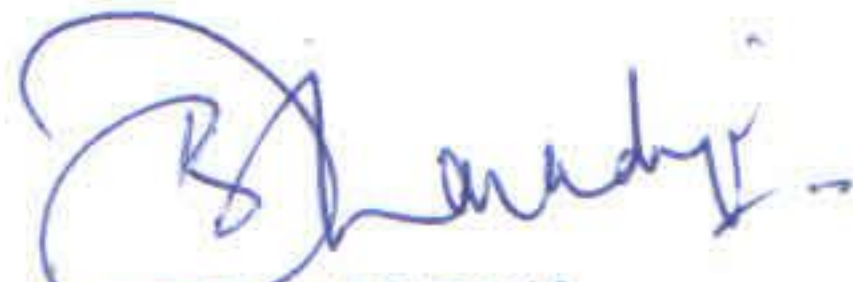
Based on the above examination, we hereby report that, during the Review Period, the Company has:

- a) complied with all the applicable provisions of the above Regulations and circulars/ guidelines issued thereunder;
- b) maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder, to the extent applicable.

We further confirm that there have been no action taken against the Company/ its promoters/ directors 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.

We further confirm that the previous year Secretarial Compliance Report dated May 30, 2019 was clean and unqualified.

For DILIP BHARADIYA & ASSOCIATES



DILIP BHARADIYA  
Proprietor  
FCS No.: 7956, C P No.: 6740  
UDIN: F007956B000436714



Place: Mumbai  
Date: 10<sup>th</sup> July, 2020