

# HAMILTON POLES MANUFACTURING CO. LIMITED

Date: 24<sup>th</sup> June, 2021

To,  
The Calcutta Stock Exchange Limited  
7 Lyons Range,  
Kolkata - 700 001

Dear Sirs,

**Sub : Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2021, pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No.CIR/CFD/CMD1/27/2019 dated 08/02/2019**

**Ref.: Script Code: 018090**

We herewith submit the Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2021, pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08/02/2019 as certified by Mr. Akhil Agarwal, Practicing Company Secretary.

Please take the same on record

Thanking you,

Yours faithfully

For, HAMILTON POLES MANUFACTURING CO LTD.

  
  
Shilpi Agarwal  
Company Secretary  
Membership No: A40917

REG OFFICE: 7 HARE STREET 4<sup>th</sup> FLOOR, KOLKATA- 700 001,

CIN: L28991WB1981PLC033462,

E-mail: hamiltonpoles@rediffmail.com, CONTACT NO. 9330234500

**SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED 31<sup>st</sup> MARCH 2021**

**PURSUANT TO REGULATION 24A OF THE SEBI [LISTING OBLIGATIONS AND  
DISCLOSURE REQUIREMENTS] REGULATION, 2015 READ ALONGWITH  
SEBI CIRCULAR CIR/CFD/CMF1/27/2019 DT 08/02/2019**

I, Akhil Agarwal have examined:

- (a) all the documents and records made available to us and explanation provided by **HAMILTON POLES MANUFACTURING CO LTD** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) 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, 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, 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- and circulars/ guidelines issued thereunder;

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:-

<i>Sr.No</i>	<i>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</i>	<i>Deviations</i>	<i>Observations/ Remarks of the Practicing Company Secretary</i>
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 my/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:

<i>Sr.No.</i>	<i>Action taken by</i>	<i>Details of violation</i>	<i>Details of action taken E.g. fines, warning letter, debarment, etc.</i>	<i>Observations/ remarks of the Practicing Company Secretary, if any.</i>
NIL				

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

<i>Sr. No.</i>	<i>Observations of the Practicing Company Secretary in the previous reports</i>	<i>Observations made in the secretarial compliance report for the year ended...</i>	<i>Actions taken by the listed entity, if any</i>	<i>Comments of the Practicing Company Secretary on the actions taken by the listed entity</i>
NIL				

Place: KOLKATA  
Date: 23/06/2021



AKHIL AGARWAL  
ACS No.: 35073  
C P No.: 16313

UDIN NO. A035073C000501319