HEXA TRADEX

May 29, 2026

BSE Limited
Corporate Relation Department
1st Floor, New Trading Ring
Rotunga Building Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai - 400 001
Stock code: 534328

National Stock Exchange of India Limited,
Listing Department,
Exchange Plaza,
Bandra Kurla Complex
Bandra (East)
Mumbai – 400 051
Stock code: HEXATRADEX

Sub. : Annual Secretarial Compliance Report for the Financial Year 2025-26.

Dear Sirs,

This is with reference to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find attached Annual Secretarial Compliance Report of the Company for the Financial Year 2025-26 issued by M/s Awanish Dwivedi & Associates, Company Secretaries.

This is for your information and record please.

Thanking you,

Yours faithfully,
For Hexa Tradex Limited,

Pravesh Srivastava

Digitally signed by Pravesh Srivastava
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2.5.4.20=e455f39c1231694e517ce96f56babbb3708
93356f4730d5bd49464f543581aa4,
postalCode=110014, l=South Delhi, st=Delhi,
serialNumber=d2dc61d157fb39697de859fe20c33e
7122cd0923ba13ffd2b32414fa54c1e4ed,
email=pravesh.srivastava@jindalsaw.com,
cn=Pravesh Srivastava
Date: 2026.05.29 17:13:52 +05'30'

Pravesh Srivastava
CEO & Company Secretary
ACS- 20993

Hexa Tradex Limited | www.hexatradex.com
Jindal Centre, 12, Bhikaiji Cama Place, New Delhi - 110066, Phone: +91 (11) 26188360-74 Fax: +91 (11) 26170691
Regd. Office: A-1, UPSIDC, Indl. Area, Nandgaon Road, Kosi Kalan, Distt. Mathura (U.P.) - 281403

CIN : L51101UP2010PLC042382

Awanish Dwivedi & Associates
Company Secretaries

**SECRETARIAL COMPLIANCE REPORT OF
HEXA TRADEX LIMITED**

For the financial year ended on 31st day of March, 2026

We, Awanish Dwivedi & Associates, a firm of practicing Company Secretaries, have examined:

a) all the documents and records made available to us and explanation provided by Hexa Tradex Limited ("the listed entity"),
b) the filings/ submissions made by the listed entity to the BSE Limited and National Stock Exchange of India Limited (hereinafter to be referred as "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 31st day of March, 2026 ("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; **Not Applicable during the reporting period**
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; **Not Applicable during the reporting period**
e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable during the reporting period**
f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations,2021; **Not Applicable during the reporting period**
g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
h) The Depositories Act, 1996;
i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client to the extent of securities issued.

k) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;

l) Any other regulations, if any

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 (Regu-lations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Obser-vations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	The Chairperson of Audit Committee shall be the independent Director and he and Chairperson of Stakeholder Relationship Committee is required to be present in	Regulation 18 (1) (d) and 20(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Non-Compliance of Regulation 18 (1) (d) and 20(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	BSE Limited and National Stock Exchange of India Limited had issued a warning letter bearing no LIST/COMP/SD/496/2025-26 and	Warning letter	Non-Compliance of Regulation 18 (1) (d) and 20(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	N.A.	The Chairperson of the Audit & Stakeholders Relationship Committee were not present at the annual general meeting of the Company held on 20th August, 2024..	The Board of Directors of Company took note of the warning letter and requested the Chairperson of Audit Committee and Stakeholder Relationship Committee to attend the Annual General Meetings of the	None

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	AGM to Address the query of stakeholders			NSE/LIST/ COMP/ HEXATRA DEX/01/2 025-2026 dated October 14, 2025, respectivel y.					Company	

b. The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	**Observations/Remarks of the Practicing Company Secretary in the Previous reports**	**Observations made in the secretarial compliance report for the financial year ended 31.03.2025**	**Compliance Requirement (Regulations/circulars/guidelines including specific clause**	**Details of Violation/deviations and actions taken/penalty imposed, if any, on the listed entity**	**Remedial actions, if any, taken by the listed entity**	**Comments of the PCS on the actions taken by the listed entity**
1.	Violation of provisions of delisting regulations and SEBI (LODR) Regulations, 2015.	Violation of provisions of delisting regulations and SEBI (LODR) Regulations, 2015.	Section 15-I of the SEBI Act, 1992 read with Rule 5 of the Adjudication Rules, 1995, I hereby impose following penalty under Section 15HB of the SEBI Act on the Noticees 1-5 and 9-13 mentioned below for violations of the following provisions of LODR Regulations & Delisting Regulations:	The Company has violated the provisions of Regulations 10(3) and Regulation 28(2) and 28(3) of SEBI (Delisting of Equity Shares) Regulations, 2021.	The penalty has been paid by each Noticees.	SEBI order has been complied by each Noticees.

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			a) Regulation 10(3), 28(2) and 28(3) of SEBI Delisting Regulations, 2021 by Noticee 1. b) Regulations 10(3), 28(2) and 28(3) of Delisting Regulations and Regulation 26(3) of LODR Regulations by Noticee 2-5. c) Regulation 15(2) of Delisting Regulations by Noticee 9-12. d) Regulations 6(2)(a) of LODR Regulations by Noticee 13.			
2.	Post facto approvals in case of certain related party transactions entered by Company during FY 2023-24.	Post facto approvals in case of certain related party transactions entered by Company during FY 2023-24.	Regulation 23 of SEBI LODR(SEBI Admin. Warning)	The company has taken post facto approvals in case of certain related party transactions entered by Company during FY 2023-24.	The Company has taken a corrective course of action, the Audit Committee and Board of Directors in their respective meetings held on 09th August, 2023 had approved and ratified the transactions. . The Board of Directors had also took note of SEBI Warning	The Company has taken a corrective course of action.

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					letter and informed to BSE & NSE.	
3.	Show Cause Notice (SEBI/HO/CFID/CFID-SEC1/P/OW/2024/10765/1) issued by SEBI dated 18th March, 2024	Not applicable	Violation of provisions of SEBI Act, Securities Contracts (Regulations) Act, 1956, SEBI (Prohibition of Fraudulent and Unfair Trade Practices) Regulations, 2003, etc.	The Company has violated provisions of SEBI Act, Securities Contracts (Regulations) Act, 1956, SEBI (Prohibition of Fraudulent and Unfair Trade Practices) Regulations, 2003	The settlement application and reply was filed with the SEBI	Currently , the matter is pending with SEBI.

c. We hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS
1.	**Secretarial Standards:** • The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	The 'listed entity' has generally complied with Secretarial Standards with respect to the Meetings of the Board of Directors (SS-1) and General Meetings (SS-2) issued by the Institute of Company Secretaries of India.
2.	**Adoption and timely updation of the Policies:** • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. • All the policies are in conformity with SEBI Regulations and	Yes	None

	have been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.		
3.	**<u>Maintenance and disclosures on Website:</u>** • The Listed entity is maintaining a functional website. • Timely dissemination of the documents/ information under a separate section on the website. • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website.	Yes	None
4.	**<u>Disqualification of Director:</u>** None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None
5.	**<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u>** a) Identification of material subsidiary companies. b) Disclosure requirement of material as well as other subsidiaries	Yes	Hexa Securities and Finance Company Limited is material subsidiary of the Company

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6.	**Related Party Transactions:** a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.	Yes	None
7.	**Disclosure of events or information:** The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
8.	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
9.	**Resignation of statutory auditors from the listed entity or its material subsidiaries:** In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and /or its material subsidiary (ies) has /have complied with paragraph 6.1 and 6.2 of section V-D of Chapter V of the Master Circular on compliance with the provisions of the SEBI LODR Regulations, 2015 by listed entities.	N.A.	Auditor has not resigned during the financial year 2025-26.

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10	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc except as reported above.	N.A.	No non-compliance observed for any SEBI regulation/circular/guidance note etc.

We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations.

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: New Delhi **Date: 26.05.2026**	**FOR AWANISH DWIVEDI & ASSOCIATES** **COMPANY SECRETARIES** **CS AWANISH DWIVEDI** **FCS 8050, CP No.9080** **UDIN: F008055H000481484** **PR No:-1632/2021**

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