

29th May, 2020

<p>1. Head- Listing & Compliance Metropolitan Stock Exchange of India Ltd. (MSEI) Vibgyor Towers, 4th floor, Plot No C 62, G - Block, Opp. Trident Hotel, Bandra Kurla Complex, Bandra (E), Mumbai – 400 098</p>	<p>2. The Head – Listing & Compliances, Calcutta Stock Exchange Limited, 7, Lyons Range, Kolkata, (W. B.) – 700001</p>
--	--

SUBMISSION IN TERMS OF REGULATION 24 (A) SEBI (LODR) REGULATION, 2015

Kindly take the submission on records and acknowledge the same.

Digitally signed by RAVI KAMRA
DN: c=IN, st=Chhattisgarh,
2.5.4.20=9f2db0de180349b7bdc6c19e
82464a11c2220e9567465345185189b
5959cc, postalCode=492004,
street=RAIPUR,
serialNumber=0a349f0dbdc6b6ac2cc1
57467c8b02332e5d8e677af411c4a
34de5e0c0, o=Personal, cn=Ravi
KAMRA
Date: 2020.05.29 13:51:46 +05'30'

P. S. Hard copy is not being sent to Calcutta Stock Exchange the intimation is being sent only through e-mail in view of the pandemic spread.

TELE: 09893126091, 0771-4048130

Email: satishbatra40@yahoo.co.in

SATISH BATRA & ASSOCIATES LLP

COMPANY SECRETARIES

2nd floor, Ashoka Plaza, Ashoka Ratan,
Vidhan Sabha Marg, Shankar Nagar,
Raipur 492007 (C. G.)

To
The Board of Directors,
New Era Alkaloids and Exports Ltd,
501, Wallfort Ozone, Fafadih,
Raipur (C.G.) 492001

Dear Sir,


ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR 2019-20

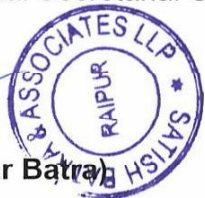
We have been engaged by **New Era Alkaloids and Exports Ltd** (hereinafter referred to as 'the Company') bearing **CIN: L24100CT1994PLC008842** whose equity shares are listed on **Calcutta Stock Exchange Limited** and **Metropolitan Stock Exchange Limited** to conduct an audit in terms of Regulations 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circular/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circular/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance note on Annual Secretarial Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.


(Satish Kumar Batra)
CP No.: 2875
FCS No.:1316



Date: 19th May, 2020
Place: Raipur
UDIN: F001316B000254690

SATISH BATRA & ASSOCIATES LLP

COMPANY SECRETARIES

2nd floor, Ashoka Plaza, Ashoka Ratan,
Vidhan Sabha Marg, Shankar Nagar,
Raipur 492007 (C. G.)

SECRETARIAL COMPLIANCE REPORT

OF

NEW ERA ALKALOIDS AND EXPORTS LTD (CIN: L24100CT1994PLC008842)

FOR THE YEAR ENDED 31ST MARCH, 2020

We have examined:

- (a) all the documents and records made available to us and explanation provided by **New Era Alkaloids And Exports Ltd** ("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 31st March, 2020 ("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. **There was no reportable event during the period under review];**



- (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; **[There was no reportable event during the period under review];**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **[There was no reportable event during the period under review];**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **[Not Applicable as the Company has not issued any debt securities];**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **[Not Applicable as the Company has not issued any Non- Convertible and Redeemable Preference Shares];**
- (h) 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,
- (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 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 Practicing Company Secretary, if any.
	NA	NA	NA	NA



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

Sr. No.	Observations of Practising Company Secretary	Observations made in Secretarial Compliance Report for the year ended on 31.03.2019	Details of action taken by listed entity (if any)	Comments of Practising Company Secretary, on actions taken by listed entity
	NA	NA	NA	NA

NOTE:

There was no physical search made by us while preparing this report due to the ongoing lockdown imposed to prevent the spread of pandemic COVID-19 virus but the Company has provided a online support for preparing this report and we have verified the documents online and also kept the same for our records.

I hereby affirm that this report is being issued after an online search and verification of all documents and records of the Company.

For Satish Batra & Associates LLP
Company Secretaries



Satish Kumar Batra
Designated Partner
FCS No.: 1316
C P No.: 2875
UDIN: F001316B000254690

Place: Raipur
Date: 19th May, 2020.