#### POLYTEX INDIA LIMITE

401, 4<sup>th</sup> Floor, Nisarg Apartment, Besant Road, Vile Parle (W), Mumbai - 400056 Tel.:91-022-67147824/827 • Fax No : 91-022-67804776 • Website : www.polytexindia.com • Email :polytexindia@qmail.com, CIN : L51900MH1987PLC042092

Date: 30.05.2022

To, BSE Limited, P.J. Towers, Dalal Street, Mumbai - 400 001

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2022 pursuant to Regulation 24A of SEBI (LOOR) (Amendment) Regulations, 2018

Dear Sir / Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018, please find herewith enclosed the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2022 as issued by Mr. Sandeep Dubey, Practicing Company Secretaries on 30th May, 2022.

IABMU

Thanking You,

Yours faithfully,

For Polytex India Limited

Arvind Mulji Kariya

AMKO

Director & CFO

DIN: 00216112



## **SANDEEP DUBEY & ASSOCIATES**

#### (Practicing Company Secretaries)

Unit No. 3133, Ezaze Zone Mall, Sundar Nagar, Malad West, Mumbai- 400062. Contact No. 9820513552; Email: <u>cs.sandeepdubey@gmail.com</u>

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# Secretarial compliance report of M/s. Polytex India Limited for the year ended March 31st, 2022.

- I, Sandeep Dubey, Company Secretary in practice have examined:
  - a) all the documents and records made available to us and explanation provided by Polytex India Limited ("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 March 31<sup>st</sup>, 2022 ("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 review period]
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; *[to the extent applicable]*
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; [Not applicable during the review period]

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; [Not applicable during the review period]
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; [Not applicable during the review period]
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; [Not applicable during the review period]
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Registrar to issue and share transfer agents) Regulations, 1993, as amended;
- (j) The Securities and Exchange Board of India (Intermediaries) Regulations, 2008; *[Not applicable during the review period]*
- (k) The Securities and Exchange Board of India (Depositaries and Participant) Regulations, 2018;
- (l) Reserve Bank of India Act, 1934; Non Banking Financial Institution Compliance.

And circulars/ guidelines issued thereunder and 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 there under, except in respect of matters specified below:-

Sr.	Compliance Requirement	Deviations	Observations/ Remarks
No.	(Regulations/ circulars /		of the Practicing
	guidelines including		<b>Company Secretary</b>
	specific clause)		
01	Regulation 30 and 31 of	The company is not filed	As explained by the
	Securities and Exchange	disclosure under	management it is complied
	Board of India (Substantial	regulation 30 and 31 for	as on date of signing of
	Acquisition of Shares and	the year ended on	this report.
	Takeovers) Regulations,	31.03.2021 of FY 2021-	
	2011	22 within the time limit	
02	Regulation 27 of SEBI	The company has not	As explained by the
	(LODR) Regulations 2015	submitted the Corporate	management due to

		Report under Regulation	unavoidable circumstance
		27 of SEBI (LODR)	this compliance was not
		Regulations 2015 for	done within time limit
		quarter ended June 30,	however it was complied
		2021 within time limit.	later on 09.08.2021
03	As per SEBI Circular	The company has not	As explained by the
	(SEBI/HO/DDHS/CIR/P/20	submitted the Large	management due to
	18/144) dated November 26,	Corporate disclosure and	unavoidable circumstance
	2018	Annual Disclosure as per	this compliance was not
		SEBI Circular as on 31st	done within prescribed
		March 2021.	period. However, it is
			complied as on date of
			signing of this report.
04	Non-Banking Financial	The Company has not	As explained by the
	Institution as specified	complied with applicable	management due to
	under Section 45 I(a) of the	provision & section made	unavoidable circumstance
	RBI Act, 1934.	under RBI Act 1934 for	this compliance was not
		NBFC Companies.	done within prescribed
			period.
05	Companies Act 2013	The Companies has not	Mrs. Ankita Gupta was
		appointed whole time	appointed as Company
		company secretary and	Secretary and Compliance
		compliance officer under	officer of the Company
		section 203 of the Act.	w.e.f. 13.08.2021.
			From 01.04.2021 till
			12.08.2021 no Company
			Secretary and Compliance
			officer was appointed.

- (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:

Sr. No.	Action Taken by	Details of Violations	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	BSE LTD	The company has not filed disclosure under regulation 30 and 31 for the year ended on 31.03.2021 of FY 2021-22 within the time limit	Reminder mail was received from exchange, No penalty levy.	The Company has done required compliance
2	BSE LTD	The company has not submitted the Corporate Report under Regulation 27 of SEBI (LODR) Regulations 2015 for quarter ended June 30, 2021 within time limit.	Reminder mail was received from exchange, No penalty levy.	The Company is in process to reply on this mail.
3	BSE LTD	The company has not submitted the Large Corporate disclosure and Annual Disclosure as per SEBI Circular as on 31st March 2021.	Reminder mail was received from exchange, No penalty levy.	The Company has filed annual disclosure as per SEBI Regulation.
4	RBI	The Company has not complied with applicable provision & section made under RBI Act 1934 for NBFC Companies.	Reminder mail was received from RBI department, however till now no penalty is levied.	The Company is in process to comply with the applicable RBI provisions.
5	Registra r of Compan ies	The Companies has not appointed whole time company secretary and compliance officer under section 203 of the Act.	Not Applicable	Mrs. Ankita Gupta was appointed as Company Secretary and Compliance officer of the Company w.e.f. 13.08.2021.

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

Sr. No.	Observations of the Practicing Company	Observations made in the secretarial	Actions taken by the listed	Comments of the Practicing
	Secretary in the	compliance report	entity, if any	Company
	previous reports	for the year ended		Secretary on
				the actions
				taken by the
				listed entity
	The Company was in	We were observed	The Company	The Company
	default with the	that the company	has appointed	has taken
	various regulation of	has in default with	whole time	corrective steps
	the SEBI (LODR)	various regulation	company	towards
	2015.	of SEBI (LODR)	secretary &	compliance with
		2015 in first quarter	compliance	the Regulation
		after that company	officer and made	of SEBI
1		has complied with	all the	(LODR) 2015,
		all regulation as	applicable	and other
		applicable to the	compliance	compliance
		company.	applicable to the	applicable to the
			company.	company.
	The Company in	We were observed	The Company	The Company
	default with the	that company in	has complied	has complied
	various section of the	default with the	with the	with all
	Companies Act. 2013	various section of	provisions of	applicable
	and rule made	the Companies Act.	Companies Act.	section &
	therein.	2013 and rule made	2013 and rule	provisions of
2		therein.	made therein.	Companies Act.
				2013 and rules
				made therein.

3	The Company in	We were observed	The Company	We observed
	default with the	that the Company	has complied	that company
	Regulation & Section	was in default under	with the	has taken
	of RBI Act, 1934.	applicable	provisions of	corrective steps
		compliance of RBI	Foreign	towards
		Act 1934 for NBFC	Exchange	compliance with
		Compliance.	Management	regulation &
			Act, 1999.	section of
				Foreign
				Exchange
				Management
				Act, 1999.

### FOR SANDEEP DUBEY & ASSOCIATES PRACTICING COMPANY SECRETARIES

CS SANDEEP DUBEY
PARTNER
M. NO. 47940.
CP NO.17902

M. No. 47940 CP No. 17902 MUMBAI

UDIN: A047940D000433061

Place: Mumbai Date: 30/05/2022