



**PITHAMPUR
POLY PRODUCTS
LIMITED**

Regd. Office & Works : Plot No. 115,
Sector - III, Industrial Area,
Pithampur - Dist. Dhar (M.P.)
Ph.: 0091-07292-403234, 407875,
Email : info@ppplonline.com
Website : www.ppplonline.com
CIN : L25202MP1994PLC008513

Date: 30/09/2021

To,

Bombay Stock Exchange Limited,
P.J. Towers, Dalal Street,
Kala Ghoda, Fort,
Mumbai -400001 (MH)

Subject: Annual report adopted in the 24th Annual General Meeting held on 30th September 2021 pursuant to Regulation 34 of the SEBI (LODR) Regulations, 2015 .

Script Code: 530683

Dear Sir,

In compliance of Regulation 34 of SEBI (Listing obligations & Disclosure Requirements) Regulations 2015, please find enclosed herewith Annual Report of the Company for the financial year ended 31st March 2021 which was adopted by the members in their Annual General Meeting held on 30th September 2021.

This is for your information and records.

Thanking you.
Yours Faithfully
For Pithampur Poly Product Limited

R.K. Tekriwal

Managing Director

(DIN00011492)

24TH
ANNUAL
REPORT
2020-2021



**PITHAMPUR POLY
PRODUCTS LIMITED**

ANNUAL REPORT (2020-21)

PITHAMPUR POLY PRODUCTS LTD.

BOARD OF DIRECTORS

Shri R.K.Tekriwal,

Managing Director

Shri Vishwanath Kanungo

Smt. Meera Tekriwal

Shri Anil Waman Jog

Registered Office

115, Sector –III, Industrial

Area, Pithampur

Dist- Dhar(MP)

Registrars & Transfer Agents

Purva Share Registry (I) Pvt. Ltd.

9, Shiv Shakti Industries,

J.R. Boricha Marg,

Opp/ Kasturba Hospital,

Lower Parel (E) Mumbai – 400 011.

Phone : [022] 23018261.

Auditors

S.N. Gadia & Co.

Chartered Accountants

241, Apollo Tower, 2 MG Road,

Indore(MP)-452001

NOTICE

NOTICE is hereby given that the 24th Annual General Meeting of the members of **Pithampur Poly Products Limited** will be held on **Thursday, 30th September 2021, at 3.00 p.m.** at *Registered Office of the Company situated at 115, Sector – III, Industrial Area, Pithampur, Dist-Dhar(MP)* shall be deemed as venue for the meeting and proceeding of the AGM shall be deemed to be made thereat, to transact the following business:-

ORDINARY BUSINESS:

1. To receive, consider and adopt the audited Balance Sheet as at 31st March, 2021 and the Profit and Loss Account for the year ended on that date together with the Auditors and Directors Report thereon.
2. To appoint a Director in place of Mr. Vishwanath Kanungo (DIN 02628075), Director of the Company who retires by rotation and, being eligible, offers himself for reappointment.
3. To consider and if thought fit, to pass with or without modification(s), the following resolution as an **Ordinary Resolutions**:

“RESOLVED THAT pursuant to Section 139 of the Companies Act, 2013 read with the Companies (Audit and Auditors) Rules, 2014 M/s S.N. Gadia & Co., Chartered Accountants (FRN 002052C), appointed as Auditor of the Company which was subject to rectification at every Annual General Meeting, be and is hereby ratified to hold office from the conclusion of this Annual General Meeting till the conclusion of next Annual General Meeting, on such remuneration as may be fixed by the Board.”

SPECIAL BUSINESS**4. Increase in Remuneration of Managing Director**

To consider and if thought fit, to pass with or without modification(s), the following resolution as an Ordinary Resolutions:

“RESOLVED THAT in accordance with the provisions of Sections 197 and 203 read with Schedule V and all other applicable provisions of the Companies Act, 2013 and the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 (including any statutory modification(s) or re-enactment thereof for the time being in force), the consent of the Company be and is hereby accorded for increase in remuneration of Mr. Rajendra Kumar Tekriwal (DIN: 00011492), Managing Director of the Company as mentioned in explanatory statement to the resolution w.e.f. 1st April, 2021;

RESOLVED FURTHER THAT the Board of Directors be and is hereby authorized to increase, reduce, alter or vary the terms of remuneration in such manner from time to time as Board may deems fit within the limits specified in schedule V of the companies Act, 2013 as existing or amended, modified or re-enacted from time to time.

RESOLVED FURTHER THAT the Board of Directors be and are hereby authorised to take all such steps as may be necessary, proper and expedient to give effect to this resolution.”

5. Revision in overall borrowing powers of the Company:

To consider and if thought fit, to pass with or without modification, if any, the following resolution as Special Resolution:-

“RESOLVED THAT in supersession of the earlier resolution passed by the members at and pursuant to Section 180(1)(c) and other applicable provisions, if any, of the Companies Act, 2013 and Rules made there under (including any statutory modification(s) or re-enactment thereof for the time being in force), the Articles of Association of the Company and subject to such other approvals as may be necessary, the consent of the members of the Company be and is hereby accorded to the Board of Directors of the Company (hereinafter referred to as the “Board” which term shall include any committee thereof for the time being exercising the powers conferred on the Board by this Resolution), to borrow from time to time, any sum or sums of monies, which together with the monies already borrowed by the Company (apart from temporary loans obtained or to be obtained from the Company’s bankers in the ordinary course of business), may exceed the aggregate of the paid-up capital of the Company, free reserves and Securities premium account that is to say, reserves not set apart for any specific purpose, provided that the total outstanding amount so borrowed shall not at any time exceed the limit of Rs. 10 Crores (Rupees Ten Crores only) (both fund and non-fund) at any one point of time.”

“RESOLVED FURTHER THAT for the purpose of giving effect to this Resolution, the Board of Directors of the Company be and is hereby authorized to finalize, settle and execute such documents / deeds / writings / papers / agreements as may be required and to do all acts, deeds, matters and things, as it may in its absolute discretion deem necessary, proper or desirable and to settle any

question, difficulty or doubt that may arise in this regard and also to delegate all or any of the above powers to a Committee constituted / to be constituted by the Board and / or any Member of such Committee / Board and generally to do all such acts, deeds and things that may be necessary, proper, expedient or incidental for the purpose of giving effect to the aforesaid Resolution.”

6. Creation of Mortgage / Charge on the assets of the Company:

To consider and if thought fit, to pass with or without modification, if any, the following resolution as Special Resolution:-

“RESOLVED THAT in supersession of the earlier resolution passed by the members and pursuant to the provisions of Section 180 (1) (a) and other applicable provisions, if any, of the Companies Act, 2013 and Rules made there under (including any statutory modification(s) or re-enactment thereof for the time being in force) and subject to such other approvals as may be necessary, the consent of the members of the Company be and is hereby accorded to the Board of Directors of the Company (hereinafter referred to as the “Board” which term shall include any committee thereof for the time being exercising the powers conferred on the Board by this Resolution), to create such charges, mortgages and hypothecations in addition or supplemental to the existing charges, mortgages and hypothecations, if any, created by the Company, on its movable and immovable properties, both present and future, and in such manner as the Board may deem fit, in favor of Banks, Financial Institutions and any Lending Agencies or bodies / Security Trustees / Agents, for the purpose of securing any borrowing, loans and / or advances already obtained or that may be obtained, together with interest, all other costs, charges and expenses and other moneys payable by the Company to the concerned Lenders, up to a sum of Rs. 10 Crores (Rupees Ten Crores only).”

“RESOLVED FURTHER THAT the Board be and is hereby authorized to do all such acts, deeds and things, to execute all such documents, instruments, agreements and writings as may be required and to delegate all or any of its powers herein conferred to a Committee constituted / to be constituted by the Board and / or any Member of such Committee with power to the said Committee to sub-delegate its powers to any of its Members for the purpose of giving effect to the aforesaid Resolution.”

7. Approval for Related Party Transactions

To consider and, if thought fit, to pass, with or without modification(s), the following resolution as a Ordinary Resolution:

“RESOLVED THAT pursuant to the provisions of Section 188 of the Companies Act, 2013 (“Act”) and other applicable provisions, if any, read with Rule 15 of the Companies (Meetings of Board and its Powers) Rules, 2014, as amended till date, Regulation 23(4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) and the Company’s policy on Related Party transaction(s), approval of Shareholders be and is hereby accorded to the Board of Directors of the Company, to borrow money from M/s Bulpack Exports Limited, a related party within the meaning of Section 2(76) of the Act and Regulation 2(1)(zb) of the Listing Regulations, of an aggregate outstanding amount not exceeding Rs. 8 Crore (Rupees Eight Crore only) provided that the said contract(s)/ arrangement(s)/ transaction(s) so carried out shall be at arm’s length basis and in the ordinary course of business of the Company.

“RESOLVED FURTHER THAT for the purpose of giving effect to this resolution, the Board of Directors of the Company (hereinafter referred to as “the Board”, which term shall be deemed to include any committee thereof) be and is hereby authorized to negotiate, finalise and agree to the terms and conditions of the aforesaid Loan, and to take all necessary steps, to execute all such documents, instruments and writings and to do all necessary acts, deed and things in order to comply with all the legal and procedural formalities and to do all such acts, deeds or things incidental or expedient thereto and as the Board may think fit and suitable.”

By order of the Board

Sd/-

Place: Pithampur
Date: 14/08/2021

R.K.Tekriwal
(Chairman & Managing Director)
DIN:00011492

Notes:

1. A member entitled to attend and vote at the Annual General Meeting (the "Meeting") is entitled to appoint a proxy to attend and vote instead of himself and the proxy need not be a member. The instrument appointing the proxy should, however, be deposited at the registered office of the company not less than forty eight hours before the commencement of the meeting.
A person can act as a proxy on behalf of the members not exceeding fifty and holding in aggregate not more than ten percent of the total share capital of the Company carrying voting rights may appoint a single person as proxy and such person shall not act as a proxy for any other person or shareholder.
2. The business set out in the Notice will be transacted through electronic voting system and the company is providing facility for voting by electronic means. Instructions and other information relating to e-voting are given in this Notice.
3. A statement pursuant to Section 102(1) of the Companies Act, 2013 relating to the Special Business to be transacted at the Meeting is annexed hereto. The Company has notified closure of Register of Members and Share Transfer Books from 25.09.2021 to 30.09.2021 (both days inclusive) for the Annual General Meeting.
4. Additional information, pursuant to Regulation 36 of the Listing Regulations, in respect of the directors seeking appointment / reappointment at the AGM, forms part of the Notice. Further, all the Independent Directors have affirmed that they meet the requirements specified under Regulation 16 (1) (b) SEBI (listing Obligation and Disclosure Requirements) Regulations, 2015 in respect of their position as an "Independent Director" of the Company.

DETAILS OF DIRECTORS SEEKING APPOINTMENT/RE-APPOINTMENT AS REQUIRED UNDER PURSUANT TO REGULATION 36(3) OF SEBI (LISTING OBLIGATION AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 AND SECRETARIAL STANDARDS-2

Particulars	SHRI VISHWANTH KANUNGO
Date of Birth	02-10-1938
Date of Appointment	05/06/2015
List of outside Directorship held	None
Chairman/ Member of the Committees of the Board of the Company	Chairman & Member : 1. Audit Comm. 2. Nomination & remuneration comm. 3. Stakeholder relationship committee Member: 1. CSR Committee
Chairman/ Member of the Committees of the Board of the other Companies in which he/she is a director	NIL
a) Audit Committee	NIL
b) Shareholder's Relationship Committee	NIL
c) Remuneration Committee	NIL
d) Committee of directors	NIL
No. & Percentage of shares held	NIL

5. Relevant documents referred to in the accompanying notice are open for inspection by the members at the Registered office or Corporate Support Center of the Company on all working days between 11.00 A.M. to 1.00 P.M. up to the date of meeting.
6. Members desirous of obtaining any information concerning Accounts and Operations of the Company are requested to address their questions in writing to the Company at least 7 days before the date of the Meeting so that the information required may be made available at the Meeting.
7. Members attending the meeting are requested to bring with them the Attendance Slip attached to the Annual Report duly filled in and signed and handover the same at the entrance of place of the meeting. Proxy/representative of a member should mark on the Attendance Slip as "Proxy" or "Representative" as the case may be.
8. Members who hold shares in dematerialized mode are requested to intimate any changes pertaining with their bank account details, ECS mandates, nominations, power of attorney, change of address/name etc. to their Depository Participant only and not to the Company's Registrar & Share Transfer Agent. Changes intimated to the Depository Participant will then be automatically reflected in the Company's records which will help the Company and its Registrar & Share Transfer Agent to provide efficient and better service to the members.
9. Members holding shares in physical form are requested to intimate all changes pertaining to their bank details, ECS mandates, nominations, power of attorney, change of address/name etc. to the Company's Registrar & Share Transfer Agent quoting their registered folio number.
10. As an austerity measure, copies of the Annual Report will not be distributed at the Annual General Meeting. Members are requested to bring their copies to the meeting.
11. Members may also note that the Notice of the 24th AGM and Annual Report 2020-21 will be available on the Company's website www.pplonline.com
12. Members who have not registered their e-mail addresses so far are requested to register their e-mail address for receiving all communications including Annual Report, Notices, and Circulars etc. from the Company electronically.
13. In compliance with the provisions of section 108 of the Act and Rules framed there under and in compliance with regulation 44 of the SEBI (LODR) Regulations, 2015, the Members are provided with the facility to cast their vote electronically, through the e-voting services provided by CSL/NSDL, on all resolutions set forth in this Notice.
14. The remote e-voting period commence on 27th September 2021 (9.00 AM) and ends on 29th September 2021 (5.00 PM). During this period members' of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date 25th September 2021, may cast their vote by remote e-voting. The remote e-voting module shall be disabled by CDSL for voting thereafter.
15. The facility for voting through ballot paper will also be made available at the Annual General Meeting (AGM) and the members attending the AGM who have not already cast their votes by remote e-voting shall be able to exercise their right at the AGM through ballot paper. Members who have cast their votes by remote e-voting prior to the AGM may attend the AGM but shall not be entitled to cast their votes again.

The instructions for e-voting are as under:

In case of members receiving e-mail:

- I. Log on the e-voting website www.evotingindia.com
- II. Click on “shareholders” tab.
- III. Now, select the “COMPANY NAME” from the drop down menu and click on “SUBMIT”.
- IV. Now enter your User ID
 - a. For CDSL: 16 digit beneficiary ID
 - b. For NSDL: 8 character DPID followed by 8 digits client ID
 - c. Member holding shares in physical form should enter folio no. registered with the company.
- V. Next enter the image verification as displayed and click on Login.
- VI. If you are holding shares in demat form and had logged on to www.evotingindia.com and voted on an earlier voting of any Company, then your existing password is to be used.
- VII. If you are a first time user follow the steps given below:

For Members holding shares in Demat Form and Physical Form	
PAN*	Enter your 10 digit alpha-numeric *PAN issued by Income Tax Department (Applicable for both demat shareholders as well as physical shareholders) <ul style="list-style-type: none"> • Members who have not updated their PAN with the Company/Depository Participant are requested to use the first two characters of the name in CAPITAL letters Eg. If your name is Ramesh Kumar with folio no. 100 then enter RA00000100 in the PAN Field.
DOB#	Enter Date of Birth (in dd/mm/yyyy format) as recorded in your demat account or in the company records in order to login.
Dividend Bank Details	Enter Dividend Bank Details as recorded in your demat account or in the company records for the said folio in order to login. <ul style="list-style-type: none"> • If both the details are not recorded with the depository or company please enter the number of shares held by you as on the cut off date in the Dividend Bank details field.

- VIII. After entering these details appropriately, click on “SUBMIT” tab.
- IX. Members holding shares in physical form will then directly reach the Company selection screen. However, members holding shares in demat form will now reach ‘Password Creation’ menu wherein they are required to mandatorily enter their login password in the new password field. Kindly note that this password is to be also used by the demat holders for voting for resolutions of any other company on which they are eligible to vote, provided that company opts for e-voting through CDSL platform. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.
- X. For Members holding shares in physical form, the details can be

used only for e-voting on the resolutions contained in this Notice.

- XI. Click on the EVSN for **Pithampur Poly Products Limited** on which you choose to vote.
- XII. On the voting page, you will see “RESOLUTION DESCRIPTION” and against the same the option “YES/NO” for voting. Select the option YES or NO as desired. The option YES implies that you assent to the Resolution and option NO implies that you dissent to the Resolution.
- XIII. Click on the “RESOLUTIONS FILE LINK” if you wish to view the entire Resolution details.
- XIV. After selecting the resolution you have decided to vote on, click on “SUBMIT”. A confirmation box will be displayed. If you wish to confirm your vote, click on “OK”, else to change your vote, click on “CANCEL” and accordingly modify your vote.
- XV. Once you “CONFIRM” your vote on the resolution, you will not be allowed to modify your vote.
- XVI. You can also take a print of the votes cast by clicking on “Click here to print” option on the Voting page.
- XVII. If a demat account holder has forgotten the login password then Enter the User ID and the image verification code and click on Forgot Password & enter the details as prompted by the system.
- XVIII. Shareholders can also cast their vote using CDSL’s mobile app m-Voting available for android based mobiles. The m-Voting app can be downloaded from Google Play Store. Please follow the instructions as prompted by the mobile app while voting on your mobile.
- XIX. Any Person who has acquired shares and become member of the Company after the dispatch of the Notice of the Annual General Meeting but before the cut-off date of 25th September 2021 may follow the same instructions as mentioned above for e-voting.
- XX. The Board of directors has appointed Harshita Modani, Practicing Company Secretary, Bharuch as Scrutinizer to scrutinize the e-voting process in fair and transparent manner.
- XXI. **Note for Non – Individual Shareholders and Custodians**
 - Non-Individual shareholders (i.e. other than Individuals, HUF, NRI etc.) and Custodian are required to log on to www.evotingindia.com and register themselves as Corporates.
 - A scanned copy of the Registration Form bearing the stamp and sign of the entity should be emailed to helpdesk.evoting@cdslindia.com.
 - After receiving the login details a Compliance User should be created using the admin login and password. The Compliance User would be able to link the account(s) for which they wish to vote on.
 - The list of accounts linked in the login should be mailed to helpdesk.evoting@cdslindia.com and on approval of the accounts they would be able to cast their vote.
 - A scanned copy of the Board Resolution and Power of Attorney (POA) which they have issued in favour of the Custodian, if any, should be uploaded in PDF format in the system for the scrutinizer to verify the same.



In case of Members receiving the physical copy:

- A. Please follow all steps from sl. No. (i) to sl. No. (xvii) above to cast vote.
- B. The voting period begins on <date and time> and ends on <date and time>, during this period shareholders of the Company, holding shares either in physical form or in dematerialised form, as on the cut off date (record date) of <record date>, may cast

their vote electronically. The e-voting module shall be disabled by CDSL for voting thereafter.

- A. In case you have any queries In case you have any queries or issues regarding e-voting, you may refer the Frequently Asked Question ("FAQ") and e-voting manual available at www.evotingindia.com under help section or write an email to helpdesk.evoting@cdslindia.com.

Explanatory Statement Pursuant to Section 102(1) of the Companies Act, 2013

ITEM NO. 4

Based on qualification and experience, the Nomination and Remuneration Committee and the board of Directors of the Company has recommends increase in remuneration of Mr. Rajendra Kumar Tekriwal, Managing Director of the Company as set out below :

- a. Salary: Increase in salary from Rs. 50,000/- Per month to Rs. 80,000/- per months w.e.f 1st April 2021.
- b. Perquisites and allowances: The perquisites and allowances shall include Rented accommodation, Medical Allowances and Leave Travel Concession.
- c. Commission: Payable for each financial year subject to the overall maximum ceiling of 5% of the net profit as computed in accordance with the provisions of Section 197 of the Companies Act, 2013 inclusive of salary, perquisites and allowances as per (a) and (b) above.
- d. Reimbursement and other facilities not considered as perquisites
 - Reimbursement of expenses incurred for traveling, boarding and lodging during business trips, expenses of telephone at residence and cell phone,
 - Provision of car with driver and petrol expenses,
 - Payment of club fees.
- e. Minimum Remuneration: In the event of loss or inadequacy of profits in any financial year during the tenure, the company has no profit or its profits are inadequate, the remuneration as set above in (a) & (b) shall be the minimum remuneration payable.
- f. No sitting fees shall be payable for attending the Board meeting or committee meeting thereof.

The notice and explanatory statement may be treated as an abstract of the terms and conditions of appointment and remuneration payable to Shri R. K. Tekriwal, as required under section 102 of the Companies Act, 2013.

None of the directors except Shri R.K. Tekriwal and Smt. Meera Tekriwal are concerned or interested in the resolution.

The Board recommends the passing of resolution by the members of the Company as a Ordinary Resolution.

Item Nos. 5 and 6

Section 180(1)(c) of the Companies Act, 2013 requires that the Board of Directors of the Company should obtain approval of the Shareholders by means of a Special Resolution, to enable the Board of Directors of the Company to borrow moneys, apart from temporary loans obtained from the Company's Bankers in the ordinary course of business, in excess of the aggregate of paid up share capital, free reserves and securities premium account of the Company.

As the Company was under IRP and Company is required to pay settlement amount to Bank. The Company requires to raise further loans / borrowings from the Lenders/Financial Institutions/Bodies Corporate/others.

Accordingly, it is proposed to increase the present limits of borrowings to Rs. 10.00 Crores (Rupees Ten Crores only).

Further, to secure the said borrowings, which the Company may borrow from time to time, the Company may be required to create mortgages / charges / hypothecation in favour of the Lenders/Financial Institutions/Bodies Corporate/others, on all or any of its movable and immovable properties. In order to create aforesaid mortgages / charges / hypothecation, the consent of the Shareholders by means of Special Resolution is required under section 180(1)(a) of Companies Act, 2013.

Accordingly, the Resolution Nos. 5 and 6 are proposed to obtain necessary consent of the members of the Company in term of the provision of Sections 180(1)(c) and 180(1)(a) of the Companies Act, 2013.

In view of the above, the Board of Directors recommends passing the resolutions as set out in item nos. 5 and 6 of this Notice as Special Resolutions.

Item No. 7

As the Company was under IRP and Company is required to pay off its creditors. The Company requires to raise further loans / borrowings from the Lenders/Financial Institutions/Bodies Corporate/others.

So, The Company is proposed to borrow Sum of Rs. Rs. 8 Crores (Rupees Eight Crores only) from M/s Bulkpack Exports Limited, which is related party within the meaning of Section 2(76) of the Act and Regulation 2(1)(zb) of the Listing Regulations, to pay off the settlement amount to creditors and which transaction is at arm's length basis.

pursuant to the provisions of Section 188 of the Companies Act, 2013 ("Act") and other applicable provisions, if any, read with Rule 15 of the Companies (Meetings of Board and its Powers) Rules, 2014, as amended till date, Regulation 23(4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), Material Related Party Transactions shall be pre-approved by the Members of the Company.

The Board recommends the resolution at Item No. 7 of this Notice for approval of Members.

Except R.K. Tekriwal and Meera Tekriwal or their respective relatives, None of the Directors and Key Managerial Personnel of the Company and their respective relatives are, in anyway, concerned or interested, financially or otherwise, in the aforesaid Ordinary Resolution set out at Item No. 7 of this Notice.

By order of the Board

Sd/-
R.K.Tekriwal
Chairman & Managing Director
DIN:00011492

Place: Pithampur
Date: 14/08/2021

DIRECTOR'S REPORT

Your Director have pleasure in presenting their 24th Annual Report on the business and operation of the company and the accounts for the financial year Ended 31st March, 2021.

FINANCIAL PERFORMANCE OF THE COMPANY :

The financial results for the year ended 31st March, 2021 and the corresponding figures for the last year are as under :-
(Rs. In Lacs)

Particulars	2020-21	2019-20
Total Income	0.00	100.07
Profit (Loss) before taxes and extraordinary items	57.82	(177.51)
Less: Extraordinary items	41.63	0.00
Profit (Loss) before tax	16.19	(177.51)
Deferred taxation	4.11	(46.37)
Net Profit/ (Loss)	12.08	(131.14)

STATE OF COMPANY'S AFFAIRS :

During the year, the Company was under IRP, therefore no business activities has been carried on during the year.

The company has earned profit of Rs. 1208097 during the year which is transferred to General Reserve.

DIVIDEND :

Considering the financial performance, your directors regret to declare any dividend.

DIRECTORS'S RESPONSIBILITY STATEMENT:

The Directors' Responsibility Statement referred to in clause (c) of Sub-section (3) of Section 134 of the Companies Act, 2013 shall state that

1. in the preparation of the annual accounts, the applicable accounting standards had been followed along with proper explanation relating to material departures;
2. The director had selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the company at the end of the financial year and of the profit and loss of the company for that period;
3. the director had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities;
4. the directors had prepared the annual accounts on a going concern basis; and
5. the directors, in the case of a listed company, had laid down internal financial controls to be followed by the company and that such internal financial controls are adequate and were operating effectively.
6. the directors had devised proper system to ensure compliance with the provisions of all applicable laws and that such system

were adequate and operating effectively.

CORPORATE GOVERNANCE

The Company has complied with the mandatory provisions on Corporate Governance as prescribed in the Regulation 27 of SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015 with the Stock Exchanges. A separate report on Corporate Governance as per schedule V {C} of SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015 is included as a part of the Annual Report along with the Auditors' Certificate on its compliance.

RELATED PARTY TRANSACTIONS

All related party transactions that were entered into during the financial year were on an arm's length basis and were in the ordinary course of business and that the provision of section 188 of the Companies Act, 1956 is not attracted.

All Related Party Transactions are placed before the Audit Committee as also the Board for approval. Details of contracts/ arrangements/transactions with the related party are given in the notes to financial statements.

As the Company was under IRP and Company is required to pay off its creditors. The Company requires to raise further loans / borrowings from the Lenders/Financial Institutions/Bodies Corporate/others.

So, The Company is proposed to borrow Sum of Rs. Rs. 8 Crores (Rupees Eight Crores only) from M/s Bulkpack Exports Limited, which is related party within the meaning of Section 2(76) of the Act and Regulation 2(1)(zb) of the Listing Regulations, to pay off the settlement amount to creditors and which transaction is at arm's length basis.

The Board recommends the resolution in notice of Annual General Meeting for approval of Members.

The Form AOC2 is not applicable.

CORPORATE SOCIAL RESPONSIBILITY

The Company has incurred losses during the last three years, so the Company has not incurred any Corporate Social Responsibility expenditure during the year under review.

However, a Corporate Social Responsibility committee consisting Shri R.K. Tekriwal as the Chairman, Mr. Anil Waman Jog and Mr. Vishwanath Kanungo, as member of the Committee. The board of directors have approved a policy on CSR.

RISK MANAGEMENT AND ADEQUACY OF INTERNAL FINANCIAL CONTROLS

The Company does not have risk management policy as the elements of the risk threatening the Company's existence are very minimal.

DIRECTORS

In terms of Section(s) 149, 152 and all other applicable provisions of the Companies Act, 2013, for the purpose of determining the directors liable to retire by rotation, the Independent Directors are not included in the total number of directors of the Company. Mr. Vishwanath Kanungo (DIN 02628075), shall retire by rotation at the ensuing Annual General Meeting and being eligible, has offered himself for re-appointment as a Director of the Company.

The Board place on records its appreciation for valuable guidance and service rendered by Mr. Vishwanath Kanungo (DIN 02628075), to the Company during her tenure.

In accordance with the provisions of Sections 197 and 203 read with Schedule V and all other applicable provisions of the Companies Act, 2013 and the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 (including any statutory modification(s) or re-enactment thereof for the time being in force) and based on qualification and experience, the Nomination and Remuneration Committee and the board of Directors of the Company has recommends increase in remuneration of Mr. Rajendra Kumar Tekriwal, Managing Director of the Company.

The notice and explanatory statement may be treated as an abstract of the terms and conditions of appointment and remuneration payable to Shri R. K. Tekriwal, as required under section 102 of the Companies Act, 2013.

Accordingly, Ordinary resolutions are proposed to take shareholders' approval for increase in remuneration of Mr. Rajendra Kumar Tekriwal, Managing Director of the Company.

DECLARATION BY INDEPENDENT DIRECTORS

Necessary declarations have been obtained from all the Independent Directors under sub-section (7) of Section 149 of the Companies Act, 2013.

MEETINGS

During the Financial year Four(4) Board Meetings and Four(4) Audit Committee Meetings were convened and held. The details of which are given in the Corporate Governance Report. The intervening gap between the Meetings was within the period prescribed under the Companies Act, 2013.

During the Year, Hon'ble NCLT through their order dated 3rd January 2020 have discontinued the present Board of Directors of the Company and appointed Insolvency Resolution Professional (IRP) to start insolvency proceeding.

The above said order of the Hon'ble NCLT have been set aside by NCLAT through their order dated 13th August 2020 and allowed the Board of Directors of the Company to function independently.

PERFORMANCE EVALUATION OF BOARD, COMMITTEE AND DIRECTORS

Pursuant to the Provisions of the Companies Act, 2013 and as stipulated under Chapter IV (17) (10) SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015, the Board of Directors has carried out an annual evaluation of its own performance, performance of its directors individually as well as the evaluation of the working of its committees. The evaluation of all directors and the Board as whole was conducted based on the criteria and framework adopted by the Board.

The Directors were satisfied with the evaluation results, which reflected overall engagement of the Board and its Committees with the company.

AUDITORS AND AUDITOR REPORT

Pursuant to the provisions of section 139 and other applicable provisions, if any, of Companies Act, 2013 read with Rule 3 of Companies (Audit and Auditors) Rules, 2014, M/s. S.N. Gadia &

Co., Chartered Accountants (FRN 002052C), appointed as Auditor of the Company which was subject to rectification at every Annual General Meeting, be and is hereby ratified to hold office from the conclusion of this Annual General Meeting till the conclusion of next Annual General Meeting, on such remuneration as may be fixed by the Board.

A resolution proposing ratification of M/s. S.N. Gadia & Co., Chartered Accountants (FRN 002052C), Chartered Accountants, as the Statutory Auditors of the company pursuant to section 139 of the Companies Act, 2013 forms part of the Notice.

The notes on Financial Statements referred to in the Auditors Report are self-explanatory and do not call for any further comments.

SECRETARIAL AUDITOR AND SECRETARIAL AUDIT REPORT

Pursuant to the provisions of Section 204 of the Companies Act, 2013 and the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, the Company has appointed Ms. Harshita Modani, Company Secretary in Practice to undertake the Secretarial Audit of the Company. The Report of the Secretarial Audit Report is annexed herewith.

The Secretarial Audit report is self-explanatory.

SUBSIDIARY, JOINT VENTURE AND ASSOCIATE COMPANY

There were no subsidiary, JV and associate Company.

PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS UNDER SECTION 186

Details of Loans:

There were NIL loans given, investment made or guarantee given or security provided as per the provisions of Section 186 of the Companies Act, 2013.

Deposit:

The Company has neither accepted nor renewed any deposits during the year under review.

PARTICULARS OF EMPLOYEES AND RELATED DISCLOSURE

Disclosures pertaining to remuneration and other details as required under Section 197(12) of the Act read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 is not applicable.

EXTRACT OF ANNUAL RETURN

The extract of Annual Return in Form No. MGT-9 as required under Section 92 of the Companies Act, 2013 for the financial year ending March 31, 2021 is annexed hereto as Annexure A and forms part of this report.

VIGIL MECHANISM / WHISTLE BLOWER POLICY

The Company has a Vigil Mechanism/Whistle Blower Policy to deal with instance of fraud and mismanagement, if any.

CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNING AND OUTGO

The provisions of Section 134(m) of the Companies Act, 2013 do not apply to our Company. There was no foreign exchange inflow or Outflow during the year under review.



TRANSFER OF AMOUNTS TO INVESTOR EDUCATION AND PROTECTION FUND

Your Company did not have any funds lying unpaid or unclaimed for a period of seven years. Therefore there were no funds which were required to be transferred to Investor Education and Protection Fund (IEPF).

MATERIAL CHANGES AND COMMITMENTS, IF ANY, AFFECTING THE FINANCIAL POSITION OF THE COMPANY WHICH OCCURRED BETWEEN THE END OF THE FINANCIAL YEAR OR THE COMPANY TO WHICH THE FINANCIAL STATEMENTS RELATE AND THE DATE OF THE REPORT

No material changes and commitments affecting the financial position of the company occurred between the end of the financial year of the company to which the financial statements relate on the date of this report.

LISTING OF SHARES

The Company's shares are listed with BSE Limited. The Company has paid its annual listing fees for financial year 2020-21.

INDUSTRIAL RELATIONS

The Company's industrial relations continued to be healthy, cordial and harmonious during the period under review.

ENVIRONMENT AND SAFETY

The Company is conscious of the importance of environment clean and safe operations. The Company's policy required conducts of operations in such a manner, so as to ensure safety of all concerned, compliances environmental regulations and preservation of natural resources.

GENERAL

Your Directors state that no disclosure or reporting is required in respect of the following items as there were no transactions on these items during the year under review:

- a) Issue of equity shares with differential rights as to dividend, voting or otherwise.
- b) Issue of shares (including sweat equity shares) to employees of the Company under any scheme.
- c) Neither the Managing Director nor the Whole-time Directors of the Company receive any remuneration or commission from its subsidiary.
- d) No significant or material orders were passed by the Regulators or Courts or Tribunals which impact the going concern status and Company's operations in future.
- e) During the year under review, there were no cases filed or reported pursuant to the Sexual Harassment of Women at

Workplace (Prevention, Prohibition and Redressal) Act, 2013.

ACKNOWLEDGEMENT

The Board desires to place on record its grateful appreciation for the excellent assistance and co-operation received and continued support extended to the Company by the bankers, investors, suppliers and esteemed customers and other business associates. Your Directors also wish to place on record their deep sense of appreciation to all the employees of the Company for their commitment and continued contribution in the performance of the company.

By order of the Board

Sd/-

R.K.Tekriwal

(Chairman & Managing Director)

DIN:00011492

Place: Pithampur

Date: 14/08/2021



ANNEXURE-A

FORM MGT-9

EXTRACT OF ANNUAL RETURN AS ON THE FINANCIAL YEAR ENDED 31ST MARCH 2021

Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1) of the Company (Management & Administration) Rules, 2014.

I. REGISTRATION & OTHER DETAILS:

1	CIN	L25202MP1994PLC008513
2	Registration Date	28/07/1994
3	Name of the Company	PITHAMPUR POLY PRODUCTS LIMITED
4	Category/Sub-category of the Company	COMPANY LIMITED BY SHARES NON –GOVT. PUBLIC COMPANY
5	Address of the Registered office & contact details	115, SECTOR I, INDUSTRIAL AREA, PITHAMPUR DIST. DHAR (MP)
6	Whether listed company	LISTED
7	Name, Address & contact details of the Registrar & Transfer Agent, if any.	Purva Share Registry (I) Pvt. Ltd. 9, Shiv Shakti Industries, J.R. Boricha Marg, Opp/ Kasturba Hospital, Lower Parel (E) Mumbai – 400 011. Phone : [022] 23018261.

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

(All the business activities contributing 10 % or more of the total turnover of the company shall be stated)

S. No.	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
1	Manufacturing of FIBC and PP woven bags and fabric	63053200	100%

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

S.No.	Name and address of the Company	CIN/GLN	Holding/ Subsidiary/ Associate	% of shares held	Applicable Section
1	NIIL				

IV. SHARE HOLDING PATTERN

(Equity share capital breakup as percentage of total equity)

(i) Category-wise Share Holding

Category of Shareholders	No. of Shares held at the beginning of the year				No. of Shares held at the end of the year				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(1) Indian									
a) Individual/ HUF	-	1805200	1805200	37.04%	-	1805200	1805200	37.04%	0.00%
b) Central Govt	-	-	-	0.00%	-	-	-	0.00%	0.00%
c) State Govt(s)	-	-	-	0.00%	-	-	-	0.00%	0.00%
d) Bodies Corp.	-	688300	688300	14.12%	-	688300	688300	14.12%	0.00%

e) Banks / FI	-	-	-	0.00%	-	-	-	0.00%	0.00%
f) Any other	-	-	-	0.00%	-	-	-	0.00%	0.00%
Sub Total (A) (1)	-	2493500	2493500	51.16%	-	2493500	2493500	51.16%	0.00%
(2) Foreign									
a) NRI Individuals	-	-	-	0.00%	-	-	-	0.00%	0.00%
b) Other Individuals	-	-	-	0.00%	-	-	-	0.00%	0.00%
c) Bodies Corp.	-	-	-	0.00%	-	-	-	0.00%	0.00%
d) Any other	-	-	-	0.00%	-	-	-	0.00%	0.00%
Sub Total (A) (2)	-	-	-	0.00%	-	-	-	0.00%	0.00%
TOTAL (A)	-	2493500	2493500	51.16%	-	2493500	2493500	51.16%	0.00%
B. Public Shareholding									
1. Institutions									
a) Mutual Funds	-	-	-	0.00%	-	-	-	0.00%	0.00%
b) Banks / FI	-	-	-	0.00%	-	-	-	0.00%	0.00%
c) Central Govt	-	-	-	0.00%	-	-	-	0.00%	0.00%
d) State Govt(s)	-	-	-	0.00%	-	-	-	0.00%	0.00%
e) Venture Capital Funds	-	-	-	0.00%	-	-	-	0.00%	0.00%
f) Insurance Companies	-	-	-	0.00%	-	-	-	0.00%	0.00%
g) FIs	-	-	-	0.00%	-	-	-	0.00%	0.00%
h) Foreign Venture Capital Funds	-	-	-	0.00%	-	-	-	0.00%	0.00%
i) Others (specify)	-	-	-	0.00%	-	-	-	0.00%	0.00%
Sub-total (B)(1):-	-	-	-	0.00%	-	-	-	0.00%	0.00%
2. Non-Institutions									
a) Bodies Corp.									
i) Indian	10800	315400	326200	6.69%	15200	315400	330600	6.78%	0.09%
ii) Overseas	-	-	-	0.00%	-	-	-	0.00%	0.00%
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 1 lakh	190200	1461800	1652000	33.89%	190300	1457300	1647600	33.80%	-0.09%
ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh	-	236300	236300	4.85%	-	236300	236300	4.85%	-
c) Others (specify)									
Non Resident Indians	12000	121500	133500	2.74%	12000	121500	133500	2.74%	0.00%
Overseas Corporate Bodies	-	30000	30000	0.62%	-	30000	30000	0.62%	-
Employee	-	-	-	0.00%	-	-	-	0.00%	-
Clearing Members	-	-	-	0.00%	-	-	-	0.00%	0.00%
Trusts	-	-	-	0.00%	-	-	-	0.00%	-
HUF	2500	-	2500	0.06%	2500	-	2500	0.05%	-
Sub-total (B)(2):-	215500	2165000	2380500	48.85%	220000	2160500	2380500	48.85%	0
Total Public (B)	215500	2165000	2380500	48.85%	220000	2160500	2380500	48.85%	0
C. Shares held by Custodian for GDRs & ADRs	-	-	-	0.00%	-	-	-	0.00%	-
Grand Total (A+B+C)	215500	4658500	4874000	100%	220000	4654000	4874000	100%	0

(ii) Shareholding of Promoter

SN	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	
1	Diya Tekriwal	471500	9.67%	0	471500	9.67%	0	0.00%
2	Suchita Tekriwal	374293	7.68%	0	374293	7.68%	0	0.00%
3	Vistar Finvest & leasing Ltd.	279300	5.73%	0	279300	5.73%	0	0.00%
4	Pithampur Investment & Finance Ltd.	200000	4.10%	0	200000	4.10%	0	0.00%
5	Mohd Iqbal	116100	2.38%	0	116100	2.38%	0	0.00%
6	Pithampur Investment & Finance Ltd.	110700	2.27%	0	110700	2.27%	0	0.00%
7	R.K. Tekriwal	68100	1.40%	0	68100	1.40%	0	0.00%
8	Meera Tekriwal	58200	1.19%	0	58200	1.19%	0	0.00%
9	Gaurav Tekriwal	58400	1.20%	0	58400	1.20%	0	0.00%
10	Suchita Tekriwal	57600	1.18%	0	57600	1.18%	0	0.00%
11	Ashish Shekhar	238007	4.88%	0	238007	4.88%	0	0.00%
12	Vistar Finvest & Leasing Ltd.	49200	1.01%	0	49200	1.01%	0	0.00%
13	Vista Finvest & Leasing P. Ltd.	49100	1.01%	0	49100	1.01%	0	0.00%
14	Ashish Shekhar	20000	0.41%	0	20000	0.41%	0	0.00%
15	K S Lakhotiya	323500	6.64%	0	323500	6.64%	0	0.00%
16	Gaurav Tekriwal	17500	0.36%	0	17500	0.36%	0	0.00%
17	Ashish Shekhar	2000	0.04%	0	2000	0.04%	0	0.00%
	Total	2493500	51.15%	0	2493500	51.15%	0	0

(iii) Change in Promoters' Shareholding (please specify, if there is no change)

SN	Particulars	Date	Reason	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
1.	At the beginning of the year	-	-	2493500	51.15%	2493500	51.15%
2.	Changes during the year	NO CHANGE					
3.	At the end of the year	-	-	2493500	51.15%	2493500	51.15%

(iv) Shareholding Pattern of top ten Shareholders:
(Other than Directors, Promoters and Holders of GDRs and ADRs):

SN	For each of the Top 10 shareholders	Date	Reason	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
1.	North American Investments Ltd.	-	-	200000	4.10%	200000	4.10%
2.	Shivratan Luharuka	-	-	143200	2.94%	143200	2.94%
3.	Jamno Perumal Kalwanz	-	-	50000	1.03%	50000	1.03%
4.	Peekay holdings Ltd.	-	-	50000	1.03%	50000	1.03%
	Total			443200	9.09%	443200	9.09%

(v) Shareholding of Directors and Key Managerial Personnel:

SN	Shareholding of each Directors and each Key Managerial Personnel	Date	Reason	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
1.	R.K. Tekriwal	-	-	68100	1.39%	68100	1.39%
2.	Meera Tekriwal	-	-	58200	1.19%	58200	1.19%

V) INDEBTEDNESS

Indebtedness of the Company including interest outstanding/accrued but not due for payment.

(Amt. Rs./Lacs)

Particulars	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	106322644	3999249	-	110321893
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
Total (i+ii+iii)	106322644	3999249	-	110321893
Change in Indebtedness during the financial year				
* Addition	-	-	-	-
* Reduction	-	-	-	-
Net Change	-	-	-	-
Indebtedness at the end of the financial year				
i) Principal Amount	-	3999249	-	3999249
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
Total (i+ii+iii)	-	3999249	-	3999249

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

SN.	Particulars of Remuneration	Name of MD/WTD/ Manager	Total Amount
	Name	RAJENDRA TEKRIWAL	(Rs/LAC)
	Designation	MD	
1	Gross salary	720000	720000
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961		-
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961		-
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961		-
2	Stock Option		-
3	Sweat Equity		-

4	Commission			-
	- as % of profit			-
	- others, specify			-
5	Others, please specify	-		
	Total (A)	-	-	720000
	Ceiling as per the Act			As per Act

B. Remuneration to other Directors

SN.	Particulars of Remuneration	Name of Directors			Total Amount (Rs/Lac)
		Vishwanath Kanungo	Anil Waman Jog		
1	Independent Directors				
	Fee for attending board committee meetings	15000	15000		30000
	Commission				-
	Others, please specify				-
	Total (1)	-	-	-	-
2	Other Non-Executive Directors	Meera Tekriwal			-
	Fee for attending board committee meetings				-
	Commission				-
	Others, please specify	360000			360000
	Total (2)	-	-	-	390000
	Total (B)=(1+2)	-	-	-	1110000
	Total Managerial Remuneration				
	Overall Ceiling as per the Act				As per Act

C. Remuneration to Key Managerial Personnel other than MD/Manager/WTD

SN.	Particulars of Remuneration	Name of Key Managerial Personnel			Total Amount (Rs/Lac)
		CEO	CFO	CS	
	Name				
	Designation	CEO	CFO	CS	
1	Gross salary				
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961				-
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961				-
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961				-
2	Stock Option				-
3	Sweat Equity				-
4	Commission				
	- as % of profit				-
	- others, specify				-
5	Others, please specify				-
	Total	-	-	-	-



VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
A. COMPANY					
Penalty	NIL	NIL	NIL	NIL	NIL
Punishment	NIL	NIL	NIL	NIL	NIL
Compounding	NIL	NIL	NIL	NIL	NIL
B. DIRECTORS					
Penalty	NIL	NIL	NIL	NIL	NIL
Punishment	NIL	NIL	NIL	NIL	NIL
Compounding	NIL	NIL	NIL	NIL	NIL
C. OTHER OFFICERS IN DEFAULT					
Penalty	NIL	NIL	NIL	NIL	NIL
Punishment	NIL	NIL	NIL	NIL	NIL
Compounding	NIL	NIL	NIL	NIL	NIL

By order of the Board

Sd/-

R.K.Tekriwal
(Chairman & Managing Director)
DIN:00011492

Place: Pithampur
Date: 14/08/2021

FORM NO. MR-3
SECRETARIAL AUDIT REPORT

For the Financial Year Ended 31st March 2020

(Pursuant to Section 204(1) of the Companies Act, 2013 and Rule No. 9 of the Companies
(Appointment and Remuneration Personnel) Rules 2014)

To,
The Members,
PITHAMPUR POLY PRODUCTS LIMITED
CIN- L25202MP1994PLC008513
115, Sector – III, Industrial Area,
Pithampur Dist. Dhar (MP)

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by PITHAMPUR POLY PRODCUTS LIMITED (hereinafter called the Company) having CIN: L25202MP1994PLC008513, Secretarial Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on 31st March 2021, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by PITHAMPUR POLY PRODUCTS LIMITED for the financial year ended on 31st March, 2021 according to the provisions of:

I. The Companies Act, 2013 (the Act) and the rules made thereunder;

The Company has complied with the provision of The Companies Act, 2013 (the Act) and the rules made thereunder.

However, the Company goes under insolvency proceeding so, there is no Company secretary appointed by the Company during the year.

II. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;

The Company has not issued any fresh securities during the year under review and therefore, question of complying with the provisions of The Securities Contracts (Regulation) Act, 1956 ('SCRA') does not arise.

However, the Company has Complied with Rule 19A with respect of continuous listing requirements with stock exchange, Rule 19 (1) with respect to filing of documents and Rule 19(2) with respect to minimum public shareholding of Securities Contract Regulation Rules.

III. The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;

The Company has complied with Clause 55A of the SEBI (depositories and Participants) Regulations, 1996 with respect to the reconciliation of share capital audit.

IV. Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;

The Company has not received any foreign direct investment or any overseas direct investment and has not made any External Commercial borrowings during the year under review.

V. The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act,1992 ('SEBI Act'):-

a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

There is no change in promoter holdings during the year.

b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992;

There are no events relating to unpublished price sensitive information took place during the year under review except quarterly financial results and there are no transactions during the year under review.

c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;

The company has not issued any share capital during the year under review, so there is not required to comply the provisions of The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009.

d) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999;

The company has not made any offer to employee under Employee Stock Option Scheme during the year under review, so there is not required to comply the provisions of The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999.

e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

The company has not issued any debt securities during the year under review, so there is not required to comply the provisions of The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008.

f) 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;

g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; and

The above said Regulations are not applicable to company, as the company has not initiated any action for voluntary delisting and no action taken by the stock exchange for compulsory delisting during the year under review.

- h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998;

The above said Regulations are not applicable to company as the Company has not purchased its own shares during the year under review.

- vi. The laws as are applicable specifically to the Company are as under:

- a. The Water (Prevention and Control of Pollution) Act, 1974;
- b. The Air (Prevention and Control of Pollution) Act, 1981;
- c. Factories Act, 1948
- d. Industrial Disputes Act, 1947
- e. The Payment of Wages Act, 1936
- f. The Minimum Wages Act, 1948
- g. The Employees State Insurance Act, 1948
- h. The Employee Provident Fund And Miscellaneous Provision Act, 1952
- i. The Payment of Bonus Act, 1965
- j. The Payment of Gratuity Act, 1972
- k. Contract Labour (Regulation And Abolition) Act, 1970
- l. The Maternity Benefits Act, 1961
- m. The Child Labour (Prohibition and Regulation) Act, 1986
- n. The Employees' Compensation Act, 1923
- o. The Apprentices Act, 1961
- p. Equal Remuneration Act, 1976

We have also examined compliance with the applicable clauses/regulations of the following:

- (I) Secretarial Standards issued by The Institute of Company Secretaries of India.

The Company has complied with the Secretarial Standards issued by ICSI.

- (II) The Listing Agreements/ Regulations entered into by the Company with BSE Limited.

The Company has complied with all clause of the listing agreement/ SEBI Listing Regulations, 2016 (LODR) .

During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above subject to the observations as stated.

I further report that: -

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

Adequate notice is given to all Directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent

generally for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.

Majority decision is carried through while the dissenting members' views, if any, are captured and recorded as part of the minutes.

We further report that there are adequate systems and processes in the Company which commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

We further report that Hon'ble NCLT through their order dated 3rd January 2020 have discontinued the present Board of Directors of the Company and appointed Insolvency Resolution Professional (IRP) to start insolvency proceeding.

During the year, the above said order of the Hon'ble NCLT have been set aside by NCLAT through their order dated 13th August 2020 and allowed the Board of Directors of the Company to function independently

We further report that during the audit period:-

1. The Members have accorded their consent to the Board of Directors at the Annual General Meeting held on December 30, 2020 for the following: -
 - a. Consider and adopt Audited Statement of accounts, Reports of the Board of Directors and Auditor for year ended 31st March 2020.
 - b. Re-appointment of Mrs. Meera Tekriwal (DIN 02014492)
 - c. Ratification of appointment of M/S S.N. Gadia & Co., Chartered Accountants, Indore as Auditor of the Company.
 - d. Reappoint Mr. R.K. Tekriwal as Chairman and Managing Director who will attain the age of Seventy (70) in this Financial Year
 - e. Reappoint Mr. Anil Waman Jog (DIN 07309676), as Independent Director who will attain the age of Seventy Four (74)
 - f. Reappoint Mr. Vishwanath Kanungoo (DIN 02628075) as Independent Director who will attain the age of Eighty Two (82)

Date: 14th August 2021

For **Harshita Modani**

Place: Bharuch

Sd/-

Harshita Modani

ACS: 19268 COP: 21944

Note: this report is to be read with our letter of even date which is annexed as an Annexure herewith and forms an integral part of this report.

ANNEXURE TO SECRETARIAL AUDIT REPORT

To,
The Members,
Pithampur Poly Products Limited,
115, Sector III, Industrial Area,
Pithampur, Dist. Dhar

Our Report of even date is to be read along with this letter.

Maintenance of secretarial records is the responsibility of the management of the Company. Our responsibility is to express an opinion on these Secretarial records based on our audit.

We have followed the audit practice and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.

We have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.

Wherever required, we have obtained the Management representations about the compliances of Laws, Rules, Regulations and happening of events etc.

The compliances of the provisions of corporate and other applicable laws, Rules, Regulations, Slandered is the responsibility of management. Our examination was limited to the verification of procedures on test basis.

The Secretarial Audit Report is neither as assurance as to the future viability of the Company nor of the efficiency or effectiveness with which the management has conducted the affairs of the Company.

Date: 14th August 2021

Place: Bharuch

For Harshita Modani

Sd/-

Harshita Modani

ACS: 19268 COP: 21944

REPORT ON CORPORATE GOVERNANCE

Company philosophy

The Company firmly believes that corporate governance and compliance practices are of paramount importance in order to maintain the trust and confidence of the stakeholders, clients, the good reputation of the Company and the unquestioned integrity of all personnel involved in the Company. To ensure transparency, fairness and objectivity in an organization functioning, the Company has proactively adopted best practices with regard to corporate governance and compliance, which are ahead of regulatory requirements. The Company's policy on compliance with external regulatory requirements is backed by stringent internal policies and principles to ensure, inter alia, priority to clients' interest over proprietary interest, maintenance of confidentiality of client information and prevention of insider trading.

1. The Governance Structure:

PPPL's governance structure is based on the principles of freedom

to the executive management within a given framework to ensure that the powers vested in the executive management are exercised with due care and responsibility so as to meet the expectation of all the stakeholders. In line with these principles, the Company has formed three tiers of Corporate Governance structure, viz.:

- (i) The Board of Director - The primary role of the Board is to protect the interest and enhance value for the stakeholders. It conducts overall strategic supervision and control by setting the goals & targets, policies, governance standards, reporting mechanism & accountability and decision making process to be followed.
- (ii) Committee of Directors - such as Audit Committee, Nomination & Remuneration Committee are focused on financial reporting, audit & internal controls, compliance issues, appointment and remuneration of Directors and Senior Management Employees.
- (iii) Executive Management – The entire business including the support services are managed with clearly demarcated responsibilities and authorities at different levels.

2. Board of Directors

Composition and Category

The Board of Directors of the Company consists of persons with considerable expertise and experience and experience in the manufacturing industry, finance & management. The Board of Directors of the Company consists of Four Directors including the Executive Chairman. Out of 4, 1 is woman director, 2 is non-executive independent director, 1 is Managing director. The Company does not have any pecuniary relation or transaction with Non-Executive Independent Directors during the year under review.

Hon'ble NCLT through their order dated 3rd January 2020 have discontinued the present Board of Directors of the Company and appointed Insolvency Resolution Professional (IRP) to start insolvency proceeding.

During the Year, the above said order of the Hon'ble NCLT have been set aside by NCLAT through their order dated 13th August 2020 and allowed the Board of Directors of the Company to function independently.

Board Procedure

A detailed Agenda folder was sent to each Director in advance (generally before 7 to 10 days) of Board and committee meetings. To enable the Board to discharge its responsibilities effectively, the Managing Director briefed the Board at every meeting on the financial performance of the Company up to last completed month as against the budget/revised budget of the year. Presentations are made by the Managing Director about the financial, operational performance and market scenario. The Board also reviewed:

- Strategy and business plans
- Annual operating and capital expenditure budgets
- Investment plans of the company
- Compliance with statutory/regulatory requirements and review of major legal issues.
- Adoption of quarterly / half yearly / annual results (after recommendation of Audit Committee where required).
- Significant labour problems • Major accounting provisions and write-offs.
- Details of joint venture or Collaboration Agreement

The Composition, Category of Directors and their other directorship and Membership/Chairmanship of Committees.

Sr. No.	Name of the Director	Category	Number of other		
			Directorships	Committee Membership	Committee Chairmanship
1.	Mr. R.K. Tekriwal	Exe. Chairman & Managing Director	1	Nil	Nil
2.	Mrs. Meera Tekriwal	Woman Director	1	Nil	Nil
3.	Mr. Vishwananth Kanungo	Ind. Dir.	Nil	Nil	Nil
4.	Mr. Anil Waman Jog	Ind. Dir.	Nil	Nil	Nil

During the year 4 Board Meetings were held on 14/08/2020, 15/09/2020, 11/11/2020 and 14/02/2021.

Hon'ble NCLT through their order dated 3rd January 2020 have discontinued the present Board of Directors of the Company and appointed Insolvency Resolution Professional (IRP) to start insolvency proceeding.

So, there is no board meeting held in the First quarter of the financial year as the Board of Directors of the Company were discontinued.

The Board was present with the relevant and necessary information. None of the Director is a member of more than 10 committees or acting as Chairman of more than 5 committees across all companies in which he is a director. The attendance at the Board Meeting during the year and at the last Annual General Meeting was as follows:

SR. NO	NAME OF DIRECTORS	NO. OF BOARD MEETING ATTENDED	ATTENDANCE AT THE LAST AGM HELD ON 30-12-2020
1	Mr. R.K. Tekriwal	4	Yes
2.	Mrs. Meera Tekriwal	4	Yes
3.	Mr. Vishwananth Kanungo	4	Yes
4.	Mr. Anil Waman Jog	4	Yes

Selection and Appointment/Re-appointment of Directors

The Nomination & Remuneration Committee have approved a Policy for the Selection, Appointment and Remuneration of Directors. Directors are appointed or re-appointed with the approval of the shareholders and shall remain in office in accordance with the provisions of the law and the retirement policy laid down by the Board from time-to-time.

Separate Meeting of Independent Directors

As stipulated by the Code of Independent Directors under the Companies Act, 2013 and the Listing Regulations, a separate meeting of the Independent Directors of the Company was held on 11TH November 2020 to review the performance of Non-independent Directors (including the Chairman) and the entire Board.

Agenda

All the meetings are conducted as per well designed and structured agenda. All the agenda items are backed by necessary

supporting information and documents (except for the critical price sensitive information, which is circulated separately or placed at the meeting) to enable the Board to take informed decisions. Agenda also includes minutes of the meetings of all the Board, Committees and Subsidiaries for the information of the Board.

Board evaluation

During the year, the Board started a formal mechanism for evaluating its performance and effectiveness as well as that of its Committees and individual Directors. The exercise was carried out through a structured evaluation process covering various aspects of the Boards functioning such as composition of the Board & committees, experience & competencies, performance of specific duties & obligations, governance issues etc. The Directors were satisfied with the evaluation results, which reflected the overall engagement and effectiveness of the Board and its Committees.

Code of Conduct

All the Board members and senior management personnel have confirmed compliance with the code. A declaration to that effect signed by the Managing Director is attached and forms part of the Annual Report of the Company.

Prevention of Insider Trading

As per SEBI (Prohibition of Insider Trading) Regulation, 2015, the Company has adopted a Code of Conduct for Prevention of Insider Trading. The trading window is closed during the time of declaration of results and occurrence of any material events as per the code. The Company has appointed Managing Director as Compliance Officer, who is responsible for setting forth procedures and implementation of the code for trading in Company's securities. During the year under review there has been due compliance with the said code.

Disclosure of Relationship between Directors Interse

Name	Relationship	Name of other directors in inter-se relationship
Shri R.K. Tekriwal	Spouse	Smt. Meera Tekriwal
Smt. Meera Tekriwal	spouse	Shri R.K. Tekriwal

No. Of Share held by Non- Executive Director

Shri Vishwananth Kanungo	Nil
Shri Anil Waman Jog	Nil

Web link: www.ppplonline.com

3. Audit Committee

The Board constituted an Audit Committee consisting of 3 Directors. All members of Audit Committee are financially literate and 2 Directors out of 3 has financial management expertise as required for member of Audit Committee as stipulated in Clause 49 of the Listing Agreement. The Details of Audit Committee meetings held during the year April 2020 to March 2021 and the attendance of the Audit Committee Members are as under:

SR. NO	DIRECTOR NAME	CATEGORY	NO OF MEETING	
			HELD	ATTENDED
1	Mr. R.K.Tekriwal	Managing Director & Member of Committee	4	4
2	Mr. Vishwanath Kanungo	Independent Director & Chairman of Committee	4	4
3	Mr. Anil Waman Jog	Independent Director & Member of Committee	4	4

Hon'ble NCLT through their order dated 3rd January 2020 have discontinued the present Board of Directors of the Company and appointed Insolvency Resolution Professional (IRP) to start insolvency proceeding.

So, there is no Committee meeting held in the First quarter of the financial year as the Board of Directors of the Company were discontinued.

Terms of Reference:-

The terms of reference for the audit committee as laid down by the Board include the following:-

- Overseeing the Company's Financial reporting process and the disclosure of its financial information to ensure that the financial statements are correct, sufficient and credible.
- Recommending the appointment and removal of statutory auditor, fixation of audit fee and also approval for payment for any other services.
- Reviewing with management, the quarterly, half yearly and annual financial statements before submission to the Board, focusing primarily on any changes in accounting policies and practices; major accounting entries based on exercise of judgement by management; qualifications in draft audit report; significant adjustments arising out of audit; the going concern assumption; compliance with accounting standards; compliance with stock exchange and legal requirements concerning financial statements; any related party transactions i.e. transactions of the Company of material nature, with promoters or the management, their subsidiaries or relatives, etc. that may have potential conflict with the interests of Company at large.
- Reviewing with the management, statutory and internal auditors, the adequacy of internal control system and ensuring compliance therewith.
- Discussions with statutory auditors before the commencement

of the audit about the nature and scope of audit as well as have post-audit discussion to ascertain any areas of concern.

- Reviewing the Company's financial and risk management policies.
- To review the functioning of the Whistle Blower Policy adopted by the Company.
- To review report on Management Discussion & Analysis of Financial Condition and Results of operation, to be included in the Company's Annual Report to its Shareholders.

4. Remuneration Committee

The company has constituted a Remuneration Committee to decide and fix payment of remuneration and sitting fees to the Directors of the Company.

The Remuneration Committee consists of Mr. R.K.Tekriwal, CMD and Member of the committee, Mr. Anil waman Jog, NEID & member and Mr. Vishwanath Kanungo, NEID & Chairman of the committee. Only one meeting of the committee held during the year under review and all members attended the meeting.

Performance evaluation for Independent Directors

Pursuant to the Provisions of the Companies Act, 2013 and as stipulated under regulation 25 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, the Board of Directors adopted a formal mechanism for evaluating its performance and as well as that of its Committees and individual Directors.

Remuneration Policy

The Company follows a policy on remuneration of Directors and Senior Management Employees.

5. Share holders's Grievance and Share transfer Committee

Composition:-

The said committee comprises of R.K.TEKRIWAL, CMD & Chairman of the committee, Shri Anil Waman Jog, NEID & member and Vishwanath Kanungo, NEID and member of the committee. There are 4 meetings during the year.

The Committee has delegated the authority to an officer of the Company who attends to share transfer formalities at least once in a fortnight.

Terms of reference:-

To look into the redressal of the shareholders complaints in respect of any matter including transfer of shares, non receipt of annual report, non receipt of declared dividend etc.

Compliance Officers :-

The company has designated Mr. R.K. Tekriwal, Managing Director of the Company as Compliance Officer as on date.

Summary Of Investor's Complaints:-

During the year NIL letters / complaints were received from the shareholders, out of which NIL letters/ complaints were replied / resolved to the satisfaction of the shareholders.

As on date, there are no complaints pending.

4. MD Certification

The MD have issued certificate pursuant to the provisions of Regulation 17(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 certifying that the financial statements do not contain any materially untrue statement and these statements represent a true and fair view of the Company's affairs. The said certificate is annexed and forms part of the Annual Report.

5. Annual General Meeting :-

The Annual General Meeting (AGMs) of the company have been held at the following places in the last three years.

YEAR	DATE	TIME	VENUE
2017-18	29-09-2018	3.00 P.M.	REGD. OFFICE – 115, Sector – III, Ind. Area, Pithampur, Dist- Dhar(MP)
2018-19	30-09-2019	3.00 P.M.	AS ABOVE
2019-20	30-12-2020	3.00 P.M.	CORPORATE OFF 507, RNT MARG, INDORE-452001

During the year under review, no extra ordinary general meeting was held as well as no resolution was passed through the Postal Ballot process

6. Means of Communication:

The periodical unaudited / audited financial results are published in Chotha Sansar(Hindi) and Free Press Journal (English) as required under the Listing Agreement. All financial and other vital information is promptly communicated to the stock exchanges on which company's shares are listed and also posted on company's website www.pplonline.com.

7. General Information for Shareholders

(a) Regd. Office:-

115, Sector-III, Ind. Area, Pithampur, Dist-Dhar(MP)

(b) Date, Time, Venue of Annual General Meeting:

30th September 2021 at 3.00 PM at the Registered Office 115, Industrial Area, Sector III, Pithampur, Dist. Dhar (MP),

(c) Financial Reporting for the quarter ending:

JUNE 30 : 14th August
 SEPT 30 : 14th November
 DEC 31 : 14th January
 MARCH 31 : 30th May

(d) Date of Book Closure :

25.09.2021 to 30.09.2021 (both days inclusive)

(e) Listing Details :

The Equity Shares of the Company are listed on the Stock Exchange at BSE. Scrip Code : BSE – 530683

(f) ISIN for Dematerialization of equity shares :

INE747D01012

(g) Market price data:

During the year from 1-04-2020 to 31-03-2021 the equity shares traded high and low price is available on BSE website viz. www.bseindia.com.

(h) Registrar And Transfer Agent:

(For share transfers and other communication relating to share certificates, change of address)

Purva Share Registry (I) Pvt. Ltd.
 9, Shiv Shakti Industries, J.R. Boricha Marg,
 Opp/ Kasturba Hospital, Lower Parel (E)
 Mumbai – 400 011. Phone : [022] 23018261.

(i) Share Transfer System

The Share Transfer-cum-Investors Grievance Committee attends to share transfer formalities once in a fortnight. Demat requests are normally confirmed within an average period of 15 days from the date of receipt. The Company has appointed following agency as Share Transfer Agent (Electronic + Physical). The shareholders may address their communication, suggestions, grievances and queries to Purva Share Registry (I) Pvt. Ltd.

(k) Categories of shareholding as on 31st March 2021

PARTICULARS	NO. OF EQUITY SHARES HELD	% OF SHARES
PROMOTERS	2493500	51.16%
CORPORATE BODIES	330600	6.78%
NRI	133500	2.74%
INDIVIDUALS	1883900	38.65%
OCB'S	30000	0.62%
HUF	2500	0.05%
TOTAL	4874000	100.00%

(L) Dematerialisation of shares & liquidity

The shares of the Company are under compulsory demat segment and are listed on Bombay Stock Exchange, Mumbai. The Company's shares are available for trading in the depository of both NSDL&CDSL.

(M) Reconciliation of Share Capital Audit

As stipulated by Securities and Exchange Board of India (SEBI), a qualified practicing Company Secretary carries out the Share Capital Audit to reconcile the total admitted capital with National Securities Depository Limited (NSDL) and Central Depository Services (India) Limited (CDSL) and the total issued and listed capital. This audit is carried out every quarter and the report thereon is submitted to stock exchanges, NSDL and CDSL and is also placed before the Board of Directors. No discrepancies were noticed during these audits.

(N) PLANT LOCATION

115, Sector-III, Ind. Area, Pithampur, Dist-Dhar(MP)

(O) INVESTOR CORRESPONDANCE

The shareholders may address their communication, suggestions, grievances and queries to:

Purva Share Registry (I) Pvt. Ltd.
9, Shiv Shakti Industries, J.R. Boricha Marg,
Opp/ Kasturba Hospital, Lower Parel (E)
Mumbai – 400 011. Phone : [022] 23018261.

8. Disclosures

There were no transaction by the company of material significance with related parties i.e. its Promoters, Directors of Companies or the Management or their relatives during the year which may have potential conflict with interest of the Company at large except remuneration to CMD.

There is not any penalties or restrictions imposed on the Company by Stock Exchanges, SEBI or any statutory or any matter related to capital markets during the last year.

9. Whistle Blower / Vigil Mechanism Policy

The Company has laid down a Whistle Blower Policy/vigil mechanism policy, which affords protection and confidentiality to whistle blowers. The Audit Committee Chairman is authorised to receive protected disclosures under this policy. The Audit Committee is also authorised to supervise the conduct of investigations of any disclosures made whistle blowers in accordance with policy.

No personnel have been denied access to the Audit Committee. As on 31st March 2021, No protected disclosures have been received under this policy.

MANAGEMENT DISCUSSION AND ANALYSIS

Forward – Looking Statement

This Report contains forward - Looking Statements. Any statement that addresses expectations or predictions about the future, including but not limited to statements about the Company's strategy and growth, product development, market position, expenditures and financial results, are forward looking statements. Forward looking statements are based on certain assumptions and expectations of future growth. The Company cannot guarantee that these assumptions are accurate and will be realized. The Company's actual results, performance or achievements could thus differ materially from those projected in any such forward-looking statements. The Company assumes no responsibility to publicly amend, modify or revise any forward-looking statements, on basis of any subsequent developments, information or events.

Industry structure and developments

The COVID-19 pandemic and consequent nationwide lockdown measure implemented since March, 2020 has worsened the prospectus across manufacturing, service and agriculture industries in India.

Comment on Current year's performance

Your Company faced huge financial distress in the financial year 2020-21. The major problem of the company started when Hon'ble

NCLT through their order dated 3rd January 2020 have discontinued the present Board of Directors of the Company and appointed Insolvency Resolution Professional (IRP) to start insolvency proceeding.

Putting limelight on the working of the Company in FY 2020-21, in such a rugged environment, the Company's has no business activities during the year.

Opportunities and outlook

Pithampur Poly is among the few HDPE/PP manufacturing companies across the world who are perpetually focusing on its products quality, durability, designing and satisfying end user requirement aptly. Nearly 65% of Company's product portfolio comprises of high-end bags for food, chemical and pharma industries and thus commands premium realisations in the export market. The Company is likely to benefit from the growth opportunities in the top three regions—America, Europe and Asia Pacific. Moreover, it's well-placed to address the growing demand in the domestic market.

The order of the Hon'ble NCLT to start insolvency proceeding have been set aside by NCLAT through their order dated 13th August 2020 and allowed the Board of Directors of the Company to function independently.

Segment wise performance

The business of the Company falls under a single segment i.e. "manufacturing and trading of HDPE/PP products" for the purpose of Accounting Standards AS-17.

Risk and concerns

Operating margin remains susceptible to fluctuations in the prices of key input i.e. polymer, which move in tandem with crude oil prices. Also, we are subjected to foreign currency exchange rate fluctuations which could have impact on results of operations. However, this is hedged by executing forward contracts, thereby mitigating forex rate fluctuation risk.

The industry is fragmented because of low entry barrier as capital and technology requirements are limited, gestation period is small and raw materials are easily available. This restricts substantial scale up in operations and exerts pricing pressure. Also, this industry being highly labour intensive the retention of workers has been high priority for the Company. Attrition of workers may affect the production and also involves cost and time in inducting and training of new appointees. Several other global as well as Indian economic and political factors that are beyond our control may affect the business of the Company.

Internal control system

The internal control system has been found to be adequate. This is reviewed periodically by the Audit Committee and statutory auditors of the Company.

Cautionary Statement

Statements in this Management Discussion and Analysis Report, Describing the Company's outlook, projections, estimates, expectations or predictions may be "Forward looking Statement" within the meaning of applicable securities laws or regulations. Actual results could differ materially from those expressed or implied.

INDEPENDENT AUDITORS' REPORT

To,
The Members,
PITHAMPUR POLY PRODUCTS LIMITED

Report on the Audit of the Financial Statements

Opinion

We have audited the accompanying Financial Statements of PITHAMPUR POLY PRODUCTS LIMITED ("the Company"), which comprises the Balance Sheet as at March 31st, 2021, the Statement of Profit and Loss, the Statement of Changes in Equity and the Statement of Cash Flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies and other explanatory information (hereinafter referred to as the 'financial statements').

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid financial statements give the information required by the Companies Act, 2013 in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at March 31st, 2021, and its Profit and Other Comprehensive Income, Changes in Equity and its Cash Flows for the year ended on that date.

Basis for Opinion

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Companies Act, 2013. Our responsibilities under those SAs are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the Companies Act, 2013 and the Rules there under, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on the financial statements.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the standalone financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. We have determined the matters described below to be the key audit matters to be communicated in our report.

Description of Key Audit Matters		
S.No.	Key Audit Matters	How was the matter addressed in our audit
1	Uncertain tax positions - Direct and Indirect Taxes	
	<p>The Company has uncertain tax matters pending litigations under direct tax and various indirect tax laws. The litigation involves significant judgement to determine the possible outcome based on which accounting treatment is given to the disputed amount.</p> <p>Given the magnitude of potential outflow of economic resources and uncertainty of potential outcome, uncertain tax positions are considered to be key audit matters.</p> <p>[Refer Note 28 to the financial statements.]</p>	<p>Our audit procedures included, among others, the following:</p> <ul style="list-style-type: none"> • Obtained details of uncertain tax position and gained understanding thereof; • Obtained details of tax assessments and also demands raised; • Along with our internal tax experts, read and analysed relevant communication with the authorities; • Evaluated advice obtained by the management from legal consultants on possible outcome of the litigation; • Discussed with senior management and evaluated management's assumptions regarding provisions made or reflected as contingent liabilities; • Assessed whether the disclosures for uncertain tax positions are in accordance with the requirements of Ind AS 37 on "Provisions, Contingent Liabilities and Contingent Assets".

Information Other than the Financial Statements and Auditors' Report Thereon

The Company's management and Board of Directors are responsible for the other information. The other information comprises the information included in the Company's annual report, but does not include the Financial Statements and our Auditors' Report thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance

conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.



Responsibilities of Management and Those Charged with Governance for the Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation of these Financial Statements that give a true and fair view of the financial position, financial performance including other comprehensive income, changes in equity and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the Indian Accounting Standards (Ind AS) specified under section 133 of the Act read with the Companies (Indian Accounting Standards) Rules, 2015, as amended. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and the design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Those Board of Directors are also responsible for overseeing the Company's financial reporting process.

Auditor's Responsibility for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they

could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under Section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls with reference to financial statements in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements for the financial year ended March 31st, 2021 and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. As required by the Companies (Auditor's Report) Order, 2016 ("the Order"), issued by the Central Government of India in terms of sub-section (11) of Section 143 of the Act, we give in the "Annexure-A", a statement on the matters specified in paragraphs 3 and 4 of the Order, to the extent applicable.
2. As required by Section 143(3) of the Act, we report that:
 - (a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of our audit;
 - (b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books;
 - (c) The Balance Sheet, the Statement of Profit and Loss, the Statement of Changes in Equity and the Cash Flow Statement dealt with by this Report are in agreement with the books of account;
 - (d) In our opinion, the aforesaid financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Companies (Indian Accounting Standards) Rules, 2015, as amended;
 - (e) On the basis of the written representations received from the directors as on March 31st, 2021, taken on record by the Board of Directors, none of the directors is disqualified as on March 31st, 2021, from being appointed as a director in terms of Section 164 (2) of the Act;
 - (f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate report in "Annexure-B"; and
 - (g) In our opinion, the managerial remuneration for the year ended March 31, 2021 has been paid/provided by the

Company to its directors in accordance with the provisions of section 197 read with Schedule V to the Act;

- (h) With respect to the other matters to be included in the Auditors' Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us:
 - (i) The Company has disclosed the impact of pending litigations on its financial position in its financial statements – Refer Note-28 to the financial statements.
 - (ii) The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.
 - (iii) There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.

For **S.N. Gadiya & Company**

Chartered Accountants

ICAI Firm Reg. No. :002052C

(S.N. GADIYA)

Place : Indore

Proprietor

Dated : August 14th, 2021

Membership No. : 071229

ANNEXURE–A TO THE INDEPENDENT AUDITORS' REPORT

Referred to in Paragraph 1, under 'Report on Other Legal and Regulatory Requirements' section of the Independent Auditors' Report of even date to the members of **PITHAMPUR POLY PRODUCTS LIMITED** on the financial statements as of and for the year ended March 31st, 2021, we report that:

- (i) (a) The Company has maintained proper records showing full particulars, including quantitative details and situation of Fixed Assets.
 - (b) As explained to us, all the Property, Plant & Equipment have been physically verified by the management in a phased periodical manner, which in our opinion is reasonable, having regard to the size of the Company and the nature of its assets. According to the information and explanations given to us, no material discrepancies were noticed on such physical verification.
 - (c) According to the information and explanations given to us by the management and on the basis of our examination of the records of the Company, the title deeds of immovable properties recorded in the books of accounts of the Company are held in the name of the Company.
- (ii) The inventory has been physically verified by the Management during the year. In our opinion, the frequency of such verification is reasonable and adequate in relation to the size of the Company and the nature of its business. The discrepancies noticed on physical verification of inventory as compared to books and records were not material and have been appropriately dealt with in the books of accounts.

- (iii) The Company has not granted any loans, secured or unsecured, to companies, firms, Limited Liability Partnerships or other parties covered in the Register maintained under Section 189 of the Companies Act, 2013.
- (iv) In our opinion and according to the information and explanations given to us, the provisions of section 185 and 186 of the Companies Act, 2013, in respect of loans and advances to entities in which the directors are interested, have been complied with by the Company. The Company has not granted any guarantee or security in terms of section 185 and 186 of the Companies Act, 2013.
- (v) According to the information and explanations given to us, the Company has not accepted any deposits from the public within the meaning of Sections 73 to 76 of the Act and the rules framed there under.
- (vi) As per information and explanations given to us, the Central Government has not specified the maintenance of cost records under sub-section (1) of section 148 of the Act, for the business of the Company.
- (vii) (a) According to the information and explanations

given to us and on the basis of examination of the records of the Company, in our opinion, the Company is generally regular in depositing the undisputed statutory dues including provident fund, employees' state insurance, income tax, sales tax, service tax, duty of customs, duty of excise, value added tax, goods and services taxes, cess and other statutory dues applicable to it, with the appropriate authorities.

According to the information and explanations given to us, no undisputed amount payable in respect of aforesaid dues were in arrears as on 31st March, 2021 for a period more than six months from the date they became payable except *Professional Tax of Rs. 1,53,113/- and Provident Fund of Rs.19,600/- and Employees' State Insurance of Rs. 6,065/-*.

- (b) According to the information and explanations given to us, there are no material dues of income tax, sales tax, service tax, duty of customs, goods and services tax, excise duty, entry tax and cess which have not been deposited with the appropriate authorities on account of any dispute, except for the following:

[Amount in Lakhs]

Sr. No.	Name of the Statute	Nature of Dues	Amount (Rs. in Lakhs)	Period for which the Amount Relates F.Y.	Forum where dispute is pending
1	Income Tax Act, 1961.	Penalty u/s. 271(1) (c)	55.56	2006-07	Income-Tax Appellate Tribunal, Indore
2	M P Commercial Tax Act, 1994	Demand	0.35	1996-97	Dy. Comm. Appellate MP Commercial Tax Dept., Indore
3	M P Commercial Tax Act, 1994	Demand	0.18	1999-2000	Dy. Comm. Appellate MP Commercial Tax Dept., Indore
4	M P Commercial Tax Act, 1994	Demand Penalty	8.25 6.36	2000-01	Dy. Comm. Appellate MP Commercial Tax Dept., Indore
5	M P Commercial Tax Act, 1994	Demand Penalty	6.79 5.10	2001-02	Dy. Comm. Appellate MP Commercial Tax Dept., Indore
6	M P Commercial Tax Act, 1994	Demand Penalty	5.78 4.16	2002-03	Dy. Comm. Appellate MP Commercial Tax Dept., Indore
7	M P Commercial Tax Act, 1994	Demand	10.68	2003-04	Dy. Comm. Appellate MP Commercial Tax Dept., Indore

- (viii) The Company had defaulted in repayment of loans and borrowings to the banks. Pursuant to the continuing defaults of the Company, a CIRP was initiated against the Company vide an order of the Principal Bench of the National Company Law Tribunal ('NCLT') dated **January 3rd, 2020**. Accordingly, no payments could be made thereafter to the banks, financial institutions, until the resolution process was concluded. However, through one Order of NCLAT bearing no. Company Appeal (AT) (Insolvency) No. 225 of 2020 dated August 13th, 2020, the proceedings of Corporate Insolvency Resolution Process under Insolvency and Bankruptcy Code, 2016 was set aside w.e.f. August 13th, 2020 and also the defaulted loans and borrowings were compromised and settled with the bank pursuant to an One Time Settlement ('OTS') proposal. There is no borrowing from the Government, financial institutions and there are no debenture holders.
- (ix) In our opinion and according to the information and explanations given to us, the Company had not raised money by way of initial public offer or further public offer (including debt instruments) during the year and the term loans taken by the Company have been applied for the purpose for which they were raised.
- (x) During the course of our examination of the books and records of the Company, carried out in accordance with the generally accepted auditing practices in India, and according to the information and explanations given to us, we have neither come across any instance of fraud by the Company or any fraud on the Company by its officers or employees, noticed or reported during the year, nor have we been informed of any such instance by the Management.
- (xi) According to the information and explanations given to us and based on our examination of the records of the Company, the managerial remuneration has been paid/ provided in accordance with the requisite approvals mandated by the provisions of Section 197 read with Schedule V to the Act.
- (xii) In our opinion and according to the information and explanations given to us, the Company is not a Nidhi Company. Accordingly, the paragraph 3(xii) of the Order is not applicable to the Company.
- (xiii) In our opinion and according to the information and explanations given to us, all transactions with related parties are in compliance with section 177 and 188 of the Act and the details, as required by

the applicable accounting standards have been disclosed in the financial statements.

- (xiv) According to the information and explanations given to us and based on our examination of the records of the Company, the Company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year under review. Accordingly, the provision of clause 3(xiv) of the Order is not applicable.
- (xv) According to the information and explanations given to us, the Company has not entered into any non-cash transactions with directors or persons connected with them during the year. Accordingly, paragraph 3(xv) of the Order is not applicable to the Company.
- (xvi) In our opinion and according to the information and explanations given to us, the Company is not required to be registered under Section 45-IA of the Reserve Bank of India Act, 1934.

For S.N. Gadiya & Company
Chartered Accountants
ICAI Firm Reg. No. :002052C

(S.N. GADIYA)

Place : Indore Proprietor
Dated : August 14th, 2021 Membership No. : 071229

**ANNEXURE-B TO THE INDEPENDENT AUDITORS'
REPORT**

**Report on the Internal Financial Controls under Clause
(i) of Sub-section 3 of Section 143 of the Companies
Act, 2013 ("the Act")**

Referred to in Paragraph 2(f), under 'Report on Other Legal and Regulatory Requirements' section of the Independent Auditors' Report of even date to the members of **Pithampur Poly Products Limited** on the financial statements as of and for the year ended March 31st, 2021, we report that:

We have audited the internal financial controls over financial reporting of PITHAMPUR POLY PRODUCTS LIMITED ("the Company") as of 31st March, 2021 in conjunction with our audit of the financial statements of the Company for the year ended on that date.

Management's Responsibility for Internal Financial Controls

The Company's management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the

essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls over Financial Reporting issued by the Institute of Chartered Accountants of India ('ICAI'). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

Auditors' Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls over Financial Reporting (the "Guidance Note") and the Standards on Auditing, issued by ICAI and deemed to be prescribed under section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the Institute of Chartered Accountants of India. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

Our audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting with reference to these financial statements.

Meaning of Internal Financial Controls over Financial Reporting

A company's internal financial control over financial

reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and (3) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

Inherent Limitations of Internal Financial Controls Over Financial Reporting

Because of the inherent limitations of internal financial controls over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may occur and not be detected. Also, projections of any evaluation of the internal financial controls over financial reporting to future periods are subject to the risk that the internal financial control over financial reporting may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at 31st March, 2021, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

For **S.N. Gadiya & Company**
Chartered Accountants
ICAI Firm Reg. No. :002052C

(S.N. GADIYA)

Proprietor

Place : Indore

Dated : August 14th, 2021

Membership No. : 071229

PITHAMPUR POLY PRODUCTS LIMITED
BALANCE SHEET AS AT 31ST MARCH, 2021

Particulars		Note No.	As at 31 st March, 2021	As at 31 st March, 2020
A	<u>ASSETS</u>			
I	<u>NON-CURRENT ASSETS</u>			
(a)	Property, Plant and Equipment	2	11,933,568	13,298,043
(b)	Financial Assets			
i)	Other Financial Assets	3	1,663,995	1,694,205
(c)	Deferred Tax Asset (Net)	4	16,274,722	16,686,052
(d)	Other Non-Current Assets	5	14,500	14,500
	(I)		29,886,785	31,692,800
II	<u>CURRENT ASSETS</u>			
(a)	Inventories	6	1,860,509	6,221,128
(b)	Financial Assets			
i)	Trade Receivables	7	3,575,542	10,527,255
ii)	Cash and Cash Equivalents	8	126,249	75,635
(c)	Current Tax Asset/Liability (Net)	9	4,092	163,861
(d)	Other Current Assets	10	23,212,988	21,999,550
	(II)		28,779,380	38,987,429
	TOTAL RUPEES (I + II)		58,666,165	70,680,229
B	<u>EQUITY AND LIABILITIES</u>			
I	<u>EQUITY</u>			
(a)	Equity Share Capital	11	51,341,000	51,341,000
(b)	Other Equity	12	(81,168,665)	(126,206,616)
	(I)		(29,827,665)	(74,865,616)
II	<u>LIABILITIES</u>			
1.	<u>NON-CURRENT LIABILITIES</u>			
(a)	Financial Liability			
i)	Non-Current Borrowings	13	3,999,249	3,999,249
	(1)		3,999,249	3,999,249
2.	<u>CURRENT LIABILITIES</u>			
(a)	(a) Financial Liabilities			
i)	Short-Term Borrowings	14	-	106,322,644
ii)	Trade Payables	15	-	-
	-Total Outstanding Dues of Micro & Small Enterprises		-	-
	-Total Outstanding Dues of Others		412,018	118,093
(b)	Other Current Liabilities	16	79,200,998	30,678,962
(c)	Short-Term Provisions	17	4,881,566	4,426,897
	(2)		84,494,581	141,546,596
	(II = 1+2)		88,493,830	145,545,845
	TOTAL RUPEES (I + II)		58,666,165	70,680,229
	Significant Accounting Policies & Practices and Other Notes	1		

Notes form integral part of these financial statements

PLACE : INDORE
DATED : AUGUST 14TH, 2021

For and on behalf of the Board of Directors
Pithampur Poly Products Limited

MANAGING DIRECTOR

DIRECTOR

AS PER OUR REPORT OF THE EVEN DATE
S N GADIYA & CO.
CHARTERED ACCOUNTANTS
PROPRIETOR
M.NO. 071229
UDIN - 21071229AAAAJJ6257

PITHAMPUR POLY PRODUCTS LIMITED
STATEMENT OF PROFIT AND LOSS FOR THE YEAR ENDED 31ST MARCH, 2021

Particulars		Note No.	For the Year ended 31 st March, 2021	For the Year ended 31 st March, 2020
REVENUE				
I	Revenue from Operations	18	-	10,007,851
II	Other Income	19	27,448,084	145,650
III	TOTAL INCOME (I + II)		27,448,084	10,153,501
EXPENSES				
IV	Purchases	20	-	-
	Changes in Inventories of Finished Goods, Work-In-Progress and Traded Goods	21	2,910,199	2,387,717
	Employee Benefits Expense	22	1,433,239	8,848,069
	Finance Costs	23	3,148,087	24,911
	Depreciation		1,364,475	1,453,019
	Other Expenses	24	12,809,213	15,191,564
	TOTAL EXPENSES (IV)		21,665,214	27,905,280
V	Profit/(Loss) before exceptional item and tax (III-IV)		5,782,870	(17,751,779)
VI	Exceptional items - Prior Period Items		4,163,443	-
VII	Profit/(Loss) before tax (V+VI)		1,619,427	(17,751,779)
VIII	Tax Expense:			
(a)	Current Tax		-	-
(b)	Current Tax Expense relating to prior years		-	-
(c)	Deferred Taxation		411,330	(4,637,282)
			411,330	(4,637,282)
IX	Profit/(Loss) for the year (VII-VIII)		1,208,097	(13,114,497)
X	Other Comprehensive Income	25		
(a)	Items that will not be reclassified to Profit & Loss		-	-
(b)	Income tax relating to items that will not be reclassified to Profit and Loss		-	-
XI	TOTAL COMPREHENSIVE INCOME FOR THE YEAR (IX+X)		1,208,097	(13,114,497)
	Earnings per share (of Rs.10/- each):			
	Basic	26	0.25	(2.69)
	Diluted		0.25	(2.69)
	Significant Accounting Policies & Practices and Other Notes	1		

Notes form integral part of these financial statements

AS PER OUR REPORT OF THE EVEN DATE
S N GADIYA & CO.
CHARTERED ACCOUNTANTS

PLACE : INDORE
DATED : AUGUST 14TH, 2021

For and on behalf of the Board of Directors
Pithampur Poly Products Limited

MANAGING DIRECTOR

DIRECTOR

PROPRIETOR
M.NO. 071229
UDIN - 21071229AAAAJJ6257



PITHAMPUR POLY PRODUCTS LIMITED
STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31ST MARCH, 2021

Sno.	Particulars	As at 31 st March, 2021		As at 31 st March, 2020	
A.	<u>CASH FLOW FROM OPERATING ACTIVITIES</u>				
	Net Profit before Tax and Exceptional Items as per Statement of Profit and Loss		5,782,870		(17,751,779)
	Add/(Deduct):				
	Depreciation	1,364,475		1,453,019	
	Finance Cost	3,148,087		24,911	
	Term Loan Settlement (Capital Reserve)	43,829,853		-	
	Exceptional Item	(4,163,443)			
	Interest Income	(27,448,084)	16,730,888	(145,650)	1,332,280
	Operating Cash Profit before Working Capital Changes		22,513,759		(16,419,499)
	Net change in :				
	Inventories	4,360,619		2,700,422	
	Trade Receivables	6,951,713		(5,295,416)	
	Other Current Assets	(1,213,438)		(756,360)	
	Current Tax Assets/Liabilities	159,769		973,061	
	Trade Payables	293,925		(8,935,986)	
	Short Term Borrowings	(106,322,644)	(46,793,352)	(20,752,361)	
	Other Current Liabilities	48,522,036		19,694,163	
	Short-Term Provisions	454,669		(1,273,895)	(13,646,373)
	Cash Flow from Operations		(24,279,593)		(30,065,872)
	Direct Taxes		-		-
	Net Cash generated from/ (used in) Operating Activities		(24,279,593)		(30,065,872)
B.	<u>CASH FLOW FROM INVESTING ACTIVITIES</u>				
	Purchase of Fixed Assets		-		-
	Increase/ (Decrease) in Non Current financial assets		30,210		1,220,980
	Increase/ (Decrease) in Other Non Current Assets		-		28,287,216
	Interest Income		27,448,084		145,650
	Net Cash generated from/ (used in) Investing Activities		27,478,294		29,653,846
C.	<u>CASH FLOW FROM FINANCING ACTIVITIES</u>				
	Finance Cost		(3,148,087)		(24,911)
	Net Cash generated from/ (used in) Financing Activities		(3,148,087)		(24,911)
	<u>NET INCREASE /(DECREASE) IN CASH AND CASH EQUIVALENTS [A+B+C]</u>		50,614		(436,937)
	Cash and cash equivalents at the beginning of the year		75,635		512,572
	Cash and cash equivalents at the end of the year		126,249		75,635
	[Refer Note - 7]				
	Components of cash and cash equivalents as at year end comprise of :				
	Cash in Hand		8,142		8,142
	Balance with Banks in Current Accounts		118,107		67,493
			126,249		75,635

Note 1. All figures in brackets are outflow.

2. Cash and cash equivalents are as per balance sheet except for fixed deposits which are not considered as cash and cash equivalents as the maturity date is beyond twelve months.

3. The above cash flow statement has been prepared under 'Indirect Method' as set out in the Indian Accounting Standard-7 on 'Cash Flow Statement' issued by the Institute of Chartered Accountants of India.

Notes form integral part of these financial statements

AS PER OUR REPORT OF THE EVEN DATE
S N GADIYA & CO.
CHARTERED ACCOUNTANTS

PLACE : INDORE

DATED : AUGUST 14TH, 2021

For and on behalf of the Board of Directors
Pithampur Poly Products Limited

MANAGING DIRECTOR

DIRECTOR

PROPRIETOR

M.NO. 071229

UDIN - 21071229AAAAAJ6257



NOTE - 2 - PROPERTY, PLANT AND EQUIPMENT

S NO.	PARTICULARS	GROSS CARRYING AMOUNT			DEPRECIATION			NET CARRYING AMOUNT		
		As at 1-4-2020	Additions	Disposals	As at 31-3-2021	As at 1-4-2020	For the year	Disposals	As at 31-3-2021	As at 31-3-2020
1	Land and Site Development	1,147,676	-	-	1,147,676	-	-	-	1,147,676	1,147,676
2	Factory Buildings	15,360,233	-	-	15,360,233	4,926,929	1,239,437	6,166,366	9,193,867	10,433,304
3	Plant and Equipment	11,535,645	-	-	11,535,645	10,165,966	44,825	10,210,791	1,324,855	1,369,679
4	Office Equipments	620,328	-	-	620,328	558,752	46,507	605,259	15,069	61,576
5	Furniture and Fixtures	365,815	-	-	365,815	81,639	33,706	115,345	250,469	284,176
6	Computers	102,464	-	-	102,464	100,832	-	100,832	1,632	1,632
	TOTAL	29,132,161	-	-	29,132,161	15,834,117	1,364,475	17,198,592	11,933,568	13,298,043
	Previous Year	29,132,161	-	-	29,132,161	14,381,098	1,453,019	15,834,117	13,298,043	14,751,062

NOTE - 3 - OTHER FINANCIAL ASSETS

Particulars	31 st March, 2021	31 st March, 2020
Security Deposits [Unsecured, considered good]	1,400,443	1,430,653
Fixed Deposits - Maturity more than 12 months	263,552	263,552
TOTAL RUPEES	1,663,995	1,694,205

NOTE - 4 - DEFERRED TAX ASSET (NET)

Particulars	31 st March, 2021	31 st March, 2020
Balance as per last year	16,686,052	12,048,770
Add : (Reversed)/Created during the year through Profit & Loss	(411,330)	4,637,282
	16,274,722	16,686,052
Add : Created during the year through Other Comprehensive Income	-	-
TOTAL RUPEES	16,274,722	16,686,052

Note - 4.1 - Component of Deferred Tax Liabilities/(Assets)

Particulars	As at 1 st April, 2020	Charge/(Credit) to Statement of Profit and Loss	As at 31 st March, 2021
A. <u>Deferred Tax Liabilities in relation to :</u>			
Property, Plant and Equipment	1,197,426	(160,941)	1,036,485
(A)	1,197,426	(160,941)	1,036,485
B. <u>Deferred Tax Assets in relation to :</u>			
Carry Forward Losses	17,883,478	(572,271)	17,311,207
(B)	17,883,478	(572,271)	17,311,207
TOTAL (A+B)	(16,686,052)	411,330	(16,274,722)

NOTE - 5 - OTHER NON-CURRENT ASSETS

Particulars	31 st March, 2021	31 st March, 2020
<u>Advances other than Capital Advances</u>		
Security Deposit (Unsecured, considered good)	14,500	14,500
TOTAL RUPEES	14,500	14,500

NOTE - 6 - INVENTORIES

[Valued at lower of cost and net realizable value]

Particulars	31 st March, 2021	31 st March, 2020
Finished Goods	-	2,733,244
Stock-In-Trade	-	484,405
Stores And Spares	1,284,846	2,735,266
Scrap & Wastage	575,663	268,213
TOTAL RUPEES	1,860,509	6,221,128

Notes: (i) Amount of inventories recognised as an expense have been disclosed in Notes 20 and 21.

NOTE - 7 - TRADE RECEIVABLES

Particulars	31 st March, 2021	31 st March, 2020
Secured, considered good	-	-
Unsecured, considered good	3,575,542	10,527,255
Trade Receivables which have significant increase in Credit Risk	-	-
Less: Impairment for trade receivables	-	-
Trade Receivables - Credit Impaired	-	-
TOTAL RUPEES	3,575,542	10,527,255

Notes: (i) No trade or other receivables are due from directors or other officers of the Company either severally or jointly with any other person. Further, trade receivables due from firms or companies in which any director or his relative is a partner, a director or a member amounts to Rs. 23,05,669 (Previous Year Rs. Nil) as at 31st March, 2021.

NOTE - 8 - CASH AND CASH EQUIVALENTS

Particulars	31 st March, 2021	31 st March, 2020
Balances with Banks in Current Accounts	118,107	67,493
Cash on Hand	8,142	8,142
TOTAL RUPEES	126,249	75,635

NOTE - 9 - CURRENT TAX ASSET/ LIABILITY (NET)

Particulars	31 st March, 2021	31 st March, 2020
Tax Deducted at Source	4,092	163,861
Less: Provision for Tax	-	-
TOTAL RUPEES	4,092	163,861

NOTE - 10 - OTHER CURRENT ASSETS

Particulars	31 st March, 2021	31 st March, 2020
A <u>Statutory Dues receivable from Government Authorities</u>		
Duties and Taxes	1,723,893	944,250
Income-Tax Refund Receivable	10,450,558	10,286,697
(A)	12,174,451	11,230,947
B <u>Advances Recoverable</u>		
Advance to Suppliers	2,652,423	2,948,516
Advance to Others	5,132,051	6,974,009
(B)	7,784,474	9,922,525
C <u>Others</u>		
Interest Receivable	-	846,078
Receivable from Bank of Baroda [erstwhile known as 'Dena Bank']	3,254,063	-
(C)	3,254,063	846,078
TOTAL RUPEES (A+B+C)	23,212,988	21,999,550

NOTE - 11 - EQUITY SHARE CAPITAL
A Authorised and Paid-up Share Capital

Particulars	As at 31 st March, 2021		As at 31 st March, 2020	
	No. of Shares	Amount	No. of Shares	Amount
AUTHORISED				
Equity Shares of Rs.10/- each	6,000,000	60,000,000	6,000,000	60,000,000
ISSUED, SUBSCRIBED & PAID-UP				
Equity Shares of Rs.10/- each Fully Paid-up	4,874,000	48,740,000	4,874,000	48,740,000
Less: Allotment Money Receivable		1,106,500		1,106,500
	4,874,000	47,633,500	4,874,000	47,633,500
SHARES FORFEITED				
Equity Shares of Rs.10/- each Fully Paid-up	716,200	3,707,500	716,200	3,707,500
	5,590,200	51,341,000	5,590,200	51,341,000

The company has issued only one class of equity shares having par value of Rs.10/- per share. Each shareholder is eligible for one vote per share. In the event of liquidation, the equity shareholders are eligible to receive the remaining assets of the company, after distribution of all preferential amounts, in proportion of their shareholding.

B Reconciliation of the number of shares outstanding at the beginning and at the end of the reporting period

Particulars	As at 31 st March, 2021		As at 31 st March, 2020	
	No. of Shares	Amount	No. of Shares	Amount
Shares outstanding at the beginning of the year	4,874,000	48,740,000	4,874,000	48,740,000
Shares issued during the year	-	-	-	-
Shares bought back during the year	-	-	-	-
Shares outstanding at the end of the year	4,874,000	48,740,000	4,874,000	48,740,000

C Details of shares held by shareholders holding more than 5% of the aggregate shares in the Company

Particulars	As at 31 st March, 2021		As at 31 st March, 2020	
	No. of Shares held	% of Holding	No. of Shares held	% of Holding
Smt. Divya Tekriwal	471,500	9.67	471,500	9.67
Smt. Suchita Tekriwal	431,893	8.86	431,893	8.86
Shri Ashish Shekhar	260,007	5.33	260,007	5.33
Shri K.S. Lakhotiya	323,500	6.64	323,500	6.64
M/s. Vistar Finvest & Leasing Limited	377,600	7.75	377,600	7.75
M/s. Pithampur Invesment & Finance Ltd.	310,700	6.37	310,700	6.37

NOTE - 12 - OTHER EQUITY

Particulars	31 st March, 2021	31 st March, 2020
Capital Reserve	43,829,853	-
[Refer Note -1]		
Retained Earnings	(124,998,518)	(126,206,616)
TOTAL RUPEES	(81,168,665)	(126,206,616)

Notes : 1 Retained Earnings are the profits/(losses) that the Company has earned / incurred till date.

2 Outstanding term loan from Bank of Baroda [previously known as Dena Bank] of Rs. 5,20,29,853/- has been settled at Rs. 82,00,000/-, under an One Time Settlement Proposal and the resulting amount of Rs. 4,38,29,853/- has been transferred to the Capital Reserve.

NOTE - 13 - NON-CURRENT BORROWINGS

Particulars	31 st March, 2021	31 st March, 2020
Other Loans and advances		
<u>Unsecured</u>		
From Body Corporates	3,999,249	3,999,249
TOTAL RUPEES	3,999,249	3,999,249

NOTE - 14 - SHORT-TERM BORROWINGS

Particulars	31 st March, 2021	31 st March, 2020
A Term Loans		
Secured		
[Refer Note-1]		
Dena Bank (Building)	-	7,869,253
Dena Bank (Plant and Machinery)	-	37,971,764
Dena Bank (Demand Loan)	-	6,188,837
(A)	-	52,029,853
B Working Capital Loans repayable on demand		
Secured		
[Refer Note-1]		
From Dena Bank	-	54,274,151
<u>Unsecured</u>		
From Directors	-	18,639
(B)	-	54,292,790
TOTAL RUPEES	(A+B)	106,322,644

NOTE - 15 - TRADE PAYABLES

Particulars	31 st March, 2021	31 st March, 2020
Total Outstanding dues of Micro and Small Enterprises	-	-
Total Outstanding dues of Others, including Acceptances	412,018	118,093
TOTAL RUPEES	412,018	118,093

NOTE - 15.1 - Information to be disclosed under Micro, Small and Medium Enterprises Development Act, 2006

The information as required to be disclosed under Micro, Small and Medium Enterprises Development Act, 2006 has been determined to the extent such parties have been identified on the basis of information available with the Company. The amount of principal and interest outstanding during the year is given below :

Particulars	As at 31 st March, 2021	As at 31 st March, 2020
(a) Principal amount remaining unpaid to any supplier as at the end of accounting year	-	-
(b) Interest due thereon remaining unpaid to any supplier as at the end of the accounting year	-	-
(c) The amount of interest paid along with the amounts of the payment made to the supplier beyond the appointed day	-	-
(d) The amount of interest due and payable for the year	-	-
(e) The amount of interest accrued and remaining unpaid at the end of the accounting year	-	-
(f) The amount of further interest due and payable even in the succeeding year, until such date when the interest dues as above are actually paid	-	-

NOTE - 16 - OTHER CURRENT LIABILITIES

Particulars	31 st March, 2021	31 st March, 2020
Others		
Statutory Dues	178,778	804,719
Book Overdraft	-	622,466
Other Liabilities	79,022,220	29,251,777
TOTAL RUPEES	79,200,998	30,678,962

NOTE - 17 - SHORT-TERM PROVISIONS

Particulars	31 st March, 2021	31 st March, 2020
For Employee Benefits	4,586,463	4,401,897
For Others	295,103	25,000
TOTAL RUPEES	4,881,566	4,426,897

NOTE - 18 - REVENUE FROM OPERATIONS

Particulars	31 st March, 2021	31 st March, 2020
A. <u>Sale of Goods</u>		
Domestic	-	2,410,068
B. <u>Sale of Services</u>		
Job Work Receipts	-	7,597,783
TOTAL RUPEES	-	10,007,851

NOTE - 19 - OTHER INCOME

Particulars	31 st March, 2021	31 st March, 2020
A <u>Interest Income</u>		
Interest on MPEB Deposit	52,908	112,826
(A)	52,908	112,826
B <u>Other Non-Operating Income</u>		
Settlement of Working Capital Loans Liability [Refer Note-1]	27,395,176	-
Sundry Balances Written-off	-	32,824
(B)	27,395,176	32,824
TOTAL RUPEES (A+B)	27,448,084	145,650

NOTE - 20 - PURCHASE OF TRADED GOODS

Particulars	31 st March, 2021	31 st March, 2020
Purchases	-	-
TOTAL RUPEES	-	-

NOTE - 21 - CHANGES IN INVENTORIES OF FINISHED GOODS, WORK-IN-PROGRESS AND TRADED GOODS

Particulars	31 st March, 2021	31 st March, 2020
A. Inventories at the end of the year		
Finished Goods	-	268,213
Scrap & Wastage	575,663	2,733,244
Traded Goods	-	484,405
(A)	575,663	3,485,862
B. Inventories at the beginning of the year		
Finished Goods	268,213	2,655,930
Scrap & Wastage	2,733,244	2,733,244
Traded Goods	484,405	484,405
(B)	3,485,862	5,873,579
CHANGES IN INVENTORIES	(B-A)	(2,387,717)

NOTE - 22 - EMPLOYEE BENEFITS EXPENSE

Particulars	31 st March, 2021	31 st March, 2020
Directors' Remuneration	1,080,000	720,000
Directors' Sitting Fees	30,000	30,000
Salary, Wages, Bonus, etc.	316,841	7,506,759
Contribution towards Provident Fund & ESIC	-	513,066
Staff Welfare Expenses	6,398	78,244
TOTAL RUPEES	1,433,239	8,848,069

NOTE - 23 - FINANCE COSTS

Particulars	31 st March, 2021	31 st March, 2020
Interest Expenses	3,144,479	13,958
Bank Charges	3,608	10,953
TOTAL RUPEES	3,148,087	24,911

NOTE - 24 - OTHER EXPENSES

Particulars	31 st March, 2021	31 st March, 2020
A Manufacturing and Operating Expenses		
Power & Fuel Expenses	4,806,901	5,954,146
Labour Charges	-	4,739,337
Stores & Spares Consumed	-	867,204
Machineries Repairs & Maintenance	-	39,927
Other Manufacturing and Operating Expenses	102,991	823,971
(A)	4,909,892	12,424,584
B Administrative Expenses		
Electricity Expenses	27,736	2,870
Stationery & Printing	14,550	87,342
Postage & Courier Expenses	15,470	17,486
Telephone Expenses	2,143	8,627
Vehicle Hire Charges	-	558,412
Vehicle Running & Maintenance	-	7,786
Repairs & Maintenance		
- Building	693,679	-
- Machineries Repairs & Maintenance	2,556,847	-
- Others	9,450	17,454

Tour & Travelling Expenses	12,274	74,511
Conveyance Expenses	-	39,236
ROC Filing Fees	15,000	33,300
Consultancy Fees	30,000	282,000
Membership & Subscription Fees	118	18,818
Listing Fees	300,000	300,000
Legal & Professional Charges	804,061	767,989
Auditors' Remuneration	25,000	25,000
Factory License Fees	-	28,961
Computer Running & Maintenance	23,965	6,321
Security Expenses	375,864	274,335
GST / TDS Return Late Filing Fees	7,600	13,200
Pooja, Parva & Festival Expenses	-	30,148
Charity & Donation	-	1,500
Office Expenses	6,391	3,654
Goods & Services Tax (old)	22,658	-
Sundry Balances Written-off	2,867,846	-
(B)	7,810,652	2,598,949
C <u>Selling, Distribution & Other Expenses</u>		
Advertisement & Publicity	86,709	76,303
Business Promotion Expenses	-	37,893
Incentive Expenses	-	21,095
Packing Expenses	1,960	32,540
Freight Outward	-	200
(C)	88,669	168,031
TOTAL RUPEES (A+B+C)	12,809,213	15,191,564

NOTE - 24.1 - BREAK-UP OF AUDIT FEES

Particulars	31 st March, 2021	31 st March, 2020
(a) Auditors' Remuneration		
- Statutory Audit Fees	25,000	20,000
- Tax Audit Fees	-	5,000
(b) Certification and Consultation Fees	-	-
TOTAL RUPEES (A+B+C)	25,000	25,000

NOTE - 25 - OTHER COMPREHENSIVE INCOME

Particulars	31 st March, 2021	31 st March, 2020
A. <u>Items that will not be reclassified into profit or loss :</u>		
(i) Change in Revaluation surplus	-	-
(ii) Remeasurement of defined benefit plans	-	-
(iii) Equity Instrument of the defined benefit plans	-	-
(iv) Fair Value changes relating to own credit risk of financial liabilities designated at fair value through profit or loss	-	-
(v) Share of other comprehensive Income in Associate and Joint Ventures, to the extent not to be classified into profit or loss	-	-
(vi) Others	-	-
(A)	-	-
B. <u>Items that will be reclassified to profit or loss:</u>		
(i) Exchange differences in translating the financial statements of foreign operation	-	-
(ii) Debt instruments through other comprehensive Income	-	-
(iii) The effective portion of gains and loss on hedging instruments in a cash flow hedge	-	-
(iv) Share of other comprehensive Income in Associate and Joint Ventures, to the extent not to be classified into profit or loss	-	-
(v) Others	-	-
(B)	-	-
TOTAL (A+B)	-	-

NOTE - 26 - EARNING PER SHARE

Particulars	31 st March, 2021	31 st March, 2020
Net Profit after Tax as per Statement of Profit and Loss attributable to Equity Shreholders	1,208,097	(13,114,497)
Weighted Average number of Equity Shares used as denominator for calculating Basic EPS	4,874,000	4,874,000
Weighted Average Potential Equity Shares	-	-
Total Weighted Average number of Equity Shares used as denominator for calculating Diluted EPS	48,74,000	48,74,000
Basic Earning Per Share	0.25	(2.69)
Diluted Earning Per Share	0.25	(2.69)
Face Value Per Equity Share	10	10

NOTE - 27- THE RECONCILIATION OF TAX EXPENSES AND THE ACCOUNTING PROFIT

Particulars	31 st March, 2021	31 st March, 2020
Profit/(Loss) before Tax	1,619,427	(17,751,779)
Effect of Ind AS Adjustments	-	-
Adjusted Profit/(Loss) before Tax	1,619,427	(17,751,779)
Applicable Tax Rate	26.00%	26.00%
Computed Tax Expense	-	-
Tax Effect of:		
Exempted Income	-	-
Expenses Disallowed	-	-
Capital Gains	-	-
Current Tax Provision	-	-
Effective Tax Rate	-	-

NOTE - 28 - CONTINGENT LIABILITIES

[Rs. in Lakhs]

Particulars	31 st March, 2020	31 st March, 2019
<u>Contingent Liability not provided in respect of</u>		
(i) Disputed Income Tax Demand	55.56	97.56
(ii) Disputed Commercial Tax Demands	47.65	47.65
(iii) Other Disputes	963.17	963.17
Commitments		
Capital Contracts remaining to be executed	-	-

Notes:

- (i) "It is not practicable for the Company to estimate the timings of cash outflows, if any, in respect of the above pending resolution of the respective proceedings."
- (ii) The Company does not expect any reimbursements in respect of the above contingent liabilities
- (iii) "Future cash outflows in respect of the above matters are determined only on receipt of judgments / decisions pending at various forums / authorities."
- (iv) The Company's pending litigations comprise of claims against the Company pertaining to proceedings pending with Excise, Income Tax, Sales/VAT tax and other authorities. The Company has reviewed all its pending litigations and proceedings and has adequately provided for where provisions are required and disclosed as contingent liabilities where applicable, in its financial statements. The Company does not expect the outcome of these proceedings to have a materially adverse effect on its financial statements.

NOTE - 29 - RELATED PARTY DISCLOSURES
(i) List of Related Parties

Sr. No.	Relationship	Name of the Party
1	Key Managerial Personnel [KMP]	1) Shri R.K. Tekriwal 2) Shri Vishwanath Kanungo 3) Shri Anil Waman Jog 4) Smt. Meera Tekriwal
2	Relatives of Directors	-
3	Concern in which Relatives of Directors are Directors/ Partners	1) Bulkpack Exports Limited 2) Fairdeal Marwar Garages Private Limited

(ii) Related Party Transactions

Related Party Transaction Summary	Key Managerial Persons		Relatives of Directors		Relatives of Directors are Directors/ Partners in Concern	
	Year ended 31 st March, 2021	Year ended 31 st March, 2020	Year ended 31 st March, 2021	Year ended 31 st March, 2020	Year ended 31 st March, 2021	Year ended 31 st March, 2020
1 Sales, Services and Other Income						
- M/s. Bulkpack Exports Ltd	-	-	-	-	-	7,597,783
Total	-	-	-	-	-	7,597,783
2 Directors' Remuneration						
-Shri RK Tekriwal	720,000	360,000	-	-	-	-
-Smt. Meera Tekriwal	360,000	90,000	-	-	-	-
Total	1,080,000	450,000	-	-	-	-
3 Loan and Advances given						
-M/s. Fairdeal Marwar Garages Ltd.	7,200	-	-	-	-	-
Total	7,200	-	-	-	-	-
4 Unsecured Loan Taken						
-Shri R.K. Tekriwal	-	29,000	-	-	-	-
Total	-	29,000	-	-	-	-
5 Unsecured Loan Repaid						
-Shri R.K. Tekriwal	18,639	81,361	-	-	-	-
Total	18,639	81,361	-	-	-	-

(iii) Balances as at 31st March, 2021

Related Party Transaction Summary	Key Managerial Persons		Relatives of Directors		Relatives of Directors are Directors/ Partners in Concern	
	Year ended 31 st March, 2021	Year ended 31 st March, 2020	Year ended 31 st March, 2021	Year ended 31 st March, 2020	Year ended 31 st March, 2021	Year ended 31 st March, 2020
1 Trade Receivables						
- M/s. Bulkpack Exports Ltd	-	-	-	-	2,305,669	19,673,776
Total	-	-	-	-	2,305,669	19,673,776
2 Trade Payables						
- M/s. Bulkpack Exports Ltd	-	-	-	-	-	10,424,177
Total	-	-	-	-	-	10,424,177
3 Loan and Advances						
-M/s. Fairdeal Marwar Garages Ltd.	-	-	-	-	4,028,462	4,021,262
-Shri R.K. Tekriwal (Cash Seizure)	500,000	500,000	-	-	-	-
Total	500,000	500,000	-	-	4,028,462	4,021,262
4 Unsecured Loans						
-Shri R.K. Tekriwal	-	18,639	-	-	-	-
Total	-	18,639	-	-	-	-

NOTE - 30 - OTHER NOTES
[1] Disclosure on Financial Instruments

- (a) All the financial instruments are initially recognized and subsequently re-measured at fair value as described below:
- (i) The fair value of Forward Foreign Exchange contracts is determined using forward exchange rates at the balance sheet date.
- (ii) All foreign currency denominated assets and liabilities are translated using exchange rate at reporting date. Fair Value measurement hierarchy:

Particulars	As at 31 st March, 2021		As at 31 st March, 2020	
	Carrying Value	Fair Value	Carrying Value	Fair Value
A. Financial Assets				
I <u>At Amortized Cost</u>				
(i) Trade Receivables	3,575,542	3,575,542	10,527,255	10,527,255
(ii) Cash & Cash Equivalents including Other Bank Balances	126,249	126,249	75,635	75,635
(iii) Loans	-	-	-	-
(iv) Other Financial Assets	1,663,995	1,663,995	1,694,205	1,694,205
II At FVTPL	-	-	-	-
III At FVTOCI	-	-	-	-
Particulars	As at 31 st March, 2021		As at 31 st March, 2020	
	Carrying Value	Fair Value	Carrying Value	Fair Value
B. Financial Liabilities				
(i) Borrowings	3,999,249	3,999,249	110,321,893	110,321,893
(ii) Trade Payables	412,018	412,018	118,093	118,093

NOTE - 31 - SEGMENT INFORMATION

The Company's operating segments are established on the basis of those components of the group that are evaluated regularly by the Executive Committee (the 'Chief Operating Decision Maker' as defined in Ind AS 108 - 'Operating Segments'), in deciding how to allocate resources and in assessing performance. These have been identified taking into account nature of products and services, the differing risks and returns and the internal business reporting systems.

- (i) The Company has only one principal operating and reporting segment, viz. PP Woven Sack Division. The accounting policies adopted for segment reporting are in line with the accounting policy of the Company with following additional policies for segment reporting.
- (a) Revenue and Expenses have been identified to a segment on the basis of relationship to operating activities of the segment. Revenue and Expenses which relate to enterprise as a whole and are not allocable to a segment on reasonable basis have been disclosed as "Unallocable".
- (b) Segment Assets and Segment Liabilities represent Assets and Liabilities in respective segments. Investments, tax related assets and other assets and liabilities that cannot be allocated to a segment on reasonable basis have been disclosed as "Unallocable".
- (ii) Primary Segment Information

(a) Segment Revenue & Results

Segment	Segment Revenue		Segment Profit	
	For the Year ended 31 st March, 2021	For the Year ended 31 st March, 2020	For the Year ended 31 st March, 2021	For the Year ended 31 st March, 2020
PP Woven Sack	-	7,597,783	1,619,427	(17,751,779)
Total	-	7,597,783	1,619,427	(17,751,779)
Other Income	27,448,084	145,650		
Administrative Costs	7,810,652	2,598,949		
Finance Costs	3,148,087	24,911		
Profit Before Tax	1,619,427	(17,751,779)		



(b) Segment Assets & Liabilities

Particulars	As at 31st March, 2021	As at 31st March, 2020
<u>Segment Assets</u>		
PP Woven Sack	58,666,165	70,680,229
Total Assets	58,666,165	70,680,229
Particulars	As at 31st March, 2021	As at 31st March, 2020
<u>Segment Liabilities</u>		
PP Woven Sack	58,666,165	70,680,229
Total Liabilities	58,666,165	70,680,229

Note :- Revenue shown in segment reporting is the gross amount of revenue and the receipt shown in profit and loss account is the gross amount of revenue less claims & scrape recovery

AS PER OUR REPORT OF THE EVEN DATE

PLACE : INDORE

S N GADIYA & CO.

DATED : AUGUST 14TH, 2021

CHARTERED ACCOUNTANTS

For and on behalf of the Board of Directors

Pithampur Poly Products Limited

MANAGING DIRECTOR

DIRECTOR

PROPRIETOR

M.NO. 071229

**NOTES TO THE FINANCIAL STATEMENTS AS AT AND
FOR THE YEAR ENDED 31ST MARCH, 2021**

NOTE - 1A - CORPORATE INFORMATION

- 1 Pithampur Poly Products Limited ("the Company"), is a Public Limited Company domiciled in India with its registered office located at 115, Sector ITI Industrial Area, Pithampur, Dhar (M.P.). Its shares are listed on Bombay Stock Exchanges (BSE).
- 2 The Company is primarily engaged in the business of Manufacturing, Trading and Job-work of Polybags. The company has manufacturing facilities in Pithampur.

NOTE - 1B - SIGNIFICANT ACCOUNTING POLICIES

1 Basis of Preparation

- 1.1 The financial statements have been prepared in accordance with Indian Accounting Standards ("Ind AS") as notified by Ministry of Corporate Affairs pursuant to Section 133 of the Companies Act, 2013 ('Act') read with the Companies (Indian Accounting Standards) Rules, 2015 as amended and other relevant provisions of the Act.
- 1.2 The financial statements of the Company for the year ended March 31st, 2021 were authorized for issue in accordance with a resolution of the Board of Directors passed on August 14th, 2021.

2 Basis of Measurement

The financial statements have been prepared on a going concern basis using historical cost convention and on accrual method of accounting.

3 Proceeding under the Insolvency and Bankruptcy Code, 2016

- 3.1 The Company was undergoing the Corporate Insolvency Resolution Process ('CIRP') under the provisions of the Insolvency and Bankruptcy Code, 2016 ('the Code') vide an Order bearing no. C.P.(I.B) No. 421/7/NCLT/AHM/2018 dated 03.01.2020 passed by the National Company Law Tribunal ('NCLT'), Ahmedabad Bench. Consequently, the powers of the Board of Directors stood suspended as per Section 17 of the Code and such powers were being exercised by the Resolution Professional (RP) appointed by the NCLT by the said order under the provisions of the Code.
- 3.2 Subsequently, aggrieved by the Order of the NCLT dated 03.01.2020, the company filed an appeal before the National Company Law Appellate Tribunal ('NCLAT'). The NCLAT, vide its order bearing no. Company Appeal (AT) (Insolvency) No. 225 of 2020 dated 13.08.2020, allowed the appeal of the company by setting-aside the impugned order of the NCLT dated 03.01.2020, to the effect that the company has now been released from all the rigours of law and has been allowed to function independently through its Board of Directors w.e.f. 13.08.2020.
- 3.3 Meanwhile, before pronouncement of the order by the NCLAT, the Financial Creditor, who filed the application under the provisions of the Code, and the company, entered into a Compromise Proposal, wherein, the entire loans (including interest) had got settled for a sum of Rs. 3.82 Crores.

4 Functional and Presentation Currency

These financial statements are presented in Indian Rupees (INR), which is the Company's functional currency. All amounts have been rounded off to the nearest lakh, unless otherwise indicated.

5 Use of estimates & judgements

- 5.1 The preparation of the financial statements requires that the Management to make estimates and assumptions that affect the reported amounts of assets and liabilities, disclosure of contingent liabilities as at the date of the financial statements and the reported amounts of revenue and expenses during the reporting period. The recognition, measurement, classification or disclosure of an item or information in the financial statements is made relying on these estimates.
- 5.2 The estimates and judgements used in the preparation of the financial statements are continuously evaluated by the Company and are based on historical experience and various other assumptions and factors (including expectations of future events) that the Company believes to be reasonable under the existing circumstances. Actual results could differ from those estimates. Any revision to accounting estimates is recognised prospectively in current and future periods.

6 Property, Plant & Equipments

- 6.1 The cost of property, plant and equipment comprises its purchase price, net of any trade discounts and rebates, any import duties and other taxes (other than those subsequently recoverable from the tax authorities), any directly attributable expenditure on making the asset ready for its intended use, including relevant borrowing costs if recognition criteria are met (for qualifying assets) and any expected costs of decommissioning. Expenditure incurred after the property, plant and equipments have been put into operation, such as repairs and maintenance, are charged to Statement of Profit and Loss in the period in which the costs are incurred.
- 6.2 Subsequent costs are included in the asset's carrying amount or recognized as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the entity and the cost can be measured reliably. In the carrying amount of an item of PPE, the cost of replacing the part of such an item is recognized when that cost is incurred if the recognition criterias are met. The carrying amount of those parts that are replaced is derecognized in accordance with the derecognition principles.

- 6.3 An item of property, plant and equipment is derecognised upon disposal or when no future economic benefits are expected to arise from the continued use of the asset. Any gain or loss arising on the disposal or retirement of an item of property, plant and equipment is determined as the difference between the sale proceeds and the carrying amount of the asset and is recognised in Statement of Profit and Loss.
- 6.4 Expenses incurred in relation to a project, net of income earned during the project development stage prior to its intended use, are considered as Pre - Operative Expenses and are disclosed under 'Capital Work - in - Progress'.
- 6.5 Assets in the course of construction are capitalised in the assets under capital work in progress account (CWIP). At the point when an asset is operating at management's intended use, the cost of construction is transferred to the appropriate category of property, plant and equipment and depreciation commences. Where an obligation (legal or constructive) exists to dismantle or remove an asset or restore a site to its former condition at the end of its useful life, the present value of the estimated cost of dismantling, removing or restoring the site is capitalized along with the cost of acquisition or construction upon completion and a corresponding liability is recognized. Revenue generated from production during the trial period is capitalised.
- 6.6 Property, plant and equipment except freehold land held for use in the production, supply or administrative purposes, are stated in the balance sheet at cost less accumulated depreciation and accumulated impairment losses, if any. Freehold or Leasehold land is stated at historical cost. Leasehold Land acquired by the Company, with an option in the lease deed, entitling the Company to purchase on outright basis after a certain period at no additional cost is not amortized.
- 6.7 The residual values, useful lives and methods of depreciation of property, plant and equipment are reviewed at each financial year end and adjusted prospectively, if appropriate.
- 6.8 Gains or losses arising from derecognition of a property, plant and equipment are measured as the difference between the net disposal proceeds and the carrying amount of the asset and are recognized in the Statement of Profit and Loss when the asset is derecognized.
- 6.9 Depreciation on Property, Plant and Equipment is provided using straight line method, except on Freehold Land, on which no depreciation is provided. Depreciation provided is based on useful life of the assets as prescribed in Schedule II to the Companies Act, 2013 . If, significant parts of an item of Property, Plant and Equipment have different useful lives, then they are accounted and depreciated for as separate items (major components) of Property, Plant and Equipment. In respect of following assets, the useful life estimates are as follows, which are prescribed lives under Schedule II to the Companies Act, 2013

S.NO.	Class of Plant, Property & Equipment	Useful Life
i)	Factory Building	30 Years
ii)	Plant & Machineries	15 Years
iii)	Office Equipments	5 Years
iv)	Furniture & Fixtures	10 Years
v)	Computers	3 Years

7 "Impairment of Non-Financial Assets - Property, Plant and Equipment and Intangible Assets"

- 7.1 The Company assesses at each reporting date as to whether there is any indication that any property, plant and equipment and intangible assets or group of assets, called Cash Generating Units (CGU) may be impaired. If any such indication exists the recoverable amount of an asset or CGU is estimated to determine the extent of impairment, if any. When it is not possible to estimate the recoverable amount of an individual asset, the Company estimates the recoverable amount of the CGU to which the asset belongs.
- 7.2 An impairment loss is recognised in the Statement of Profit and Loss to the extent, asset's carrying amount exceeds its recoverable amount. The recoverable amount is higher of an asset's fair value less cost of disposal and value in use. Value in use is based on the estimated future cash flows, discounted to their present value using pre-tax discount rate that reflects current market assessments of the time value of money and risk specific to the assets.
- 7.3 The impairment loss recognised in prior accounting period is reversed if there has been a change in the estimate of recoverable amount.

8 Borrowing Cost

- 8.1 Borrowing costs include exchange differences arising from foreign currency borrowings to the extent they are regarded as an adjustment to the interest cost. Borrowing costs directly attributable to the acquisition, construction or production of an asset that necessarily takes a substantial period of time to get ready for its intended use or sale are capitalised as part of the cost of the asset. A qualifying asset is one that necessarily takes substantial period of time to get ready for its intended use.
- 8.2 Interest income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing costs eligible for capitalisation.
- 8.3 All other borrowing costs are expensed in the period in which they occur.

9 Statement of Cash Flows

- 9.1 Cash and Cash equivalents

For the purpose of presentation in the statement of cash flows, cash and cash equivalents includes cash on hand, other short-term, highly liquid investments with original maturities of three months or less that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value.

9.2 Statement of Cash Flows is prepared in accordance with the Indirect Method prescribed in the relevant Ind AS.

10 Inventories

10.1 Cost of inventories includes cost of purchase, costs of conversion and other costs directly attributable to the acquisition and in bringing the inventories to their present location and condition.

10.2 Inventories of stores, spare parts, fuel and loose tools are stated at the lower of cost and net realizable value. Net realisable value represents the estimated selling price for inventories in the ordinary course of business less all estimated costs of completion and estimated costs necessary to make the sale.

11 Revenue from Operations

11.1 "Revenue from sale of goods is recognised when the significant risks and rewards of ownership have been transferred to the buyer, recovery of the consideration is probable, the associated cost can be estimated reliably, there is no continuing effective control or managerial involvement with the goods, and the amount of revenue can be measured reliably."

11.2 Revenue from rendering of services is recognised when the performance obligation to render the services are completed as per contractually agreed terms.

11.3 Revenue from sale of goods is measured at the fair value of the consideration received or receivable after taking into account contractually defined terms of payment and excluding trade discounts, volume rebates and taxes or duties collected on behalf of the Government such as Goods and Services Tax [GST].

12 Other Income

12.1 Interest Income

For all Debt Instruments measured either at Amortized Cost or at Fair Value through Other Comprehensive Income, interest income is recorded using the Effective Interest Rate [EIR]. EIR is the rate that exactly discounts the estimated future cash payments or receipts over the expected life of the financial instrument or a shorter period, where appropriate, to the gross carrying amount of the financial asset or to the amortized cost of a financial liability.

13 Employee Benefits

13.1 Short Term Employee Benefits

The undiscounted amount of short term employee benefits expected to be paid in exchange for the services rendered by employees are recognised as an expense during the period when the employees render the services.

13.2 Post-Employment Benefits

A defined contribution plan is a post-employment benefit plan under which the Company pays specified contributions to a separate entity. The Company makes specified monthly contributions towards Provident Fund, Superannuation Fund and Pension Scheme. The Company's contribution is recognised as an expense in the Statement of Profit and Loss during the period in which the employee renders the related service.

14 Taxation

14.1 Income-Tax expense comprises of current and deferred income tax. Income tax expense is recognised in net profit in the Statement of Profit and Loss except to the extent that it relates to items recognized directly in equity, in which case it is recognized in other comprehensive income or Equity.

14.2 Current tax assets and liabilities are measured at the amount expected to be recovered from or paid to the taxation authorities, based on tax rates and laws that are enacted or substantively enacted at the Balance sheet date.

14.3 Deferred tax is recognised on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit.

14.4 Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realised, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period. The carrying amount of deferred tax liabilities and assets are reviewed at the end of each reporting period.

14.5 Deferred tax assets are recognised to the extent it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forward of unused tax losses can be utilised.

15 Earnings Per Share

Basic earnings per share is computed by dividing the profit/(loss) for the year by the weighted average number of equity shares outstanding during the year. The weighted average number of equity shares outstanding during the year is adjusted for bonus issue, bonus element in a rights issue to existing shareholders, share split and reverse share split (consolidation of shares). Diluted earnings per share is computed by dividing the profit/(loss) for the year as adjusted for dividend, interest and other charges to expense or income (net of any attributable taxes) relating to the dilutive potential equity shares, by the weighted average number of equity shares considered for deriving basic earnings per share and the weighted average number of equity shares which could have been issued on the conversion of all dilutive potential equity shares.

16 Provisions, Contingencies and Commitments

- 16.1 Provisions are recognised when the Company has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. Such provisions are determined based on management's estimate of the amount required to settle the obligation at the balance sheet date. When the Company expects some or all of a provision to be reimbursed, the reimbursement is recognised as a standalone asset only when the reimbursement is virtually certain.
- 16.2 If the effect of the time value of money is material, provisions are discounted using a current pre-tax rate that reflects, when appropriate, the risks specific to the liability. When discounting is used, the increase in the provision due to the passage of time is recognised as a finance cost.
- 16.3 Contingent liabilities are disclosed on the basis of judgment of the management. These are reviewed at each balance sheet date and are adjusted to reflect the current management's estimate.
- 16.4 Contingent assets are not recognized but are disclosed in the financial statements when inflow of economic benefits is probable.

17 Financial Instruments

- 17.1 Financial assets and financial liabilities are recognized when Company becomes a party to the contractual provisions of the instruments. Financial assets and financial liabilities are initially measured at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities (other than financial assets and financial liabilities at fair value through profit or loss) are added to or deducted from the fair value of the financial assets or financial liabilities, as appropriate, on initial recognition. Transaction costs directly attributable to the acquisition of financial assets or financial liabilities at fair value through profit or loss are recognized immediately in Statement of Profit and Loss.

Financial Assets

Financial assets are recognised when the Company becomes a party to the contractual provisions of the instruments. Financial assets other than trade receivables are initially recognised at fair value plus transaction costs for all financial assets not carried at fair value through profit or loss. Financial assets carried at fair value through profit or loss are initially recognised at fair value, and transaction costs are expensed in the Statement of Profit and Loss.

17.2 Subsequent measurement

Financial assets, other than equity instruments, are subsequently measured at amortised cost, fair value through other comprehensive income or fair value through profit or loss on the basis of both:

- i) The entity's business model for managing the financial assets and
- ii) The contractual cash flow characteristics of the financial asset.

17.3 Impairment of Financial Assets

- i) The Company recognises a loss allowance for Expected Credit Losses (ECL) on financial assets that are measured at amortised cost and at FVOCI. The credit loss is difference between all contractual cash flows that are due to an entity in accordance with the contract and all the cash flows that the entity expects to receive (i.e. all cash shortfalls), discounted at the original effective interest rate. This is assessed on an individual or collective basis after considering all reasonable and supportable including that which is forwardlooking.
- ii) The Company's trade receivables or contract revenue receivables do not contain significant financing component and loss allowance on trade receivables is measured at an amount equal to life time expected losses i.e. expected cash shortfall, being simplified approach for recognition of impairment loss allowance.
- iii) Under simplified approach, the Company does not track changes in credit risk. Rather it recognizes impairment loss allowance based on the lifetime ECL at each reporting date right from its initial recognition. The Company uses a provision matrix to determine impairment loss allowance on the portfolio of trade receivables.
- iv) The provision matrix is based on its historically observed default rates over the expected life of the trade receivable and is adjusted for forward looking estimates. At every reporting date, the historical observed default rates are updated and changes in the forward-looking estimates are analysed.
- v) For financial assets other than trade receivables, the Company recognises 12-months expected credit losses for all originated or acquired financial assets if at the reporting date the credit risk of the financial asset has not increased significantly since its initial recognition. The expected credit losses are measured as lifetime expected credit losses if the credit risk on financial asset increases significantly since its initial recognition. If, in a subsequent period, credit quality of the instrument improves such that there is no longer significant increase in credit risks since initial recognition, then the Company reverts to recognizing impairment loss allowance based on 12 months ECL. The impairment losses and reversals are recognised in Statement of Profit and Loss. For equity instruments and financial assets measured at FVTPL, there is no requirement for impairment testing.

17.4 Derecognition of Financial Assets

- i) The Company derecognises a financial asset when the contractual rights to the cash flows from the asset expire, or when it transfers the financial asset and substantially all the risks and rewards of ownership of the asset to another party. If the Company neither

transfers nor retains substantially all the risks and rewards of ownership and continues to control the transferred asset, the Company recognises its retained interest in the asset and an associated liability for amounts it may have to pay. If the Company retains substantially all the risks and rewards of ownership of a transferred financial asset, the Company continues to recognise the financial asset and also recognises a collateralised borrowing for the proceeds received.

Financial Liabilities and Equity Instruments

17.5 Classification as Debt or Equity

Debt and equity instruments issued by a Company entity are classified as either financial liabilities or as equity in accordance with the substance of the contractual arrangements and the definitions of a financial liability and an equity instrument.

17.6 Equity Instruments

An equity instrument is any contract that evidences a residual interest in the assets of an entity after deducting all of its liabilities. Equity instruments issued by a Company entity are recognised at the proceeds received, net of direct issue costs. Repurchase of the Company's own equity instruments is recognised and deducted directly in equity. No gain or loss is recognised in Statement of Profit and Loss on the purchase, sale, issue or cancellation of the Company's own equity instruments.

17.7 Financial Liabilities

All Financial liabilities are measured at amortized cost using effective interest method or fair value through profit and loss. However, financial liabilities that arise when a transfer of a financial asset does not qualify for derecognition or when the continuing involvement approach applies, financial guarantee contracts issued by the Company, and commitments issued by the Company to provide a loan at below-market interest rate are measured in accordance with the specific accounting policies set out below.

17.8 Financial Liabilities at FVTPL

- i) Financial liabilities are classified as at FVTPL when the financial liability is either contingent consideration recognised by the Company as an acquirer in a business combination to which Ind AS 103 applies or is held for trading or it is designated as at FVTPL.
- ii) Financial liabilities at FVTPL are stated at fair value, with any gains or losses arising on remeasurement recognised in Statement of Profit and Loss. The net gain or loss recognised in Statement of Profit and Loss incorporates any interest paid on the financial liability and is included in the 'Other income' line item.
- iii) However, for non-held-for-trading financial liabilities that are designated as at FVTPL, the amount of change in the fair value of the financial liability that is attributable to changes in the credit risk of that liability is recognised in other comprehensive income, unless the recognition of the effects of changes in the liability's credit risk in other comprehensive income would create or enlarge an accounting mismatch in profit or loss, in which case these effects of changes in credit risk are recognised in Statement of Profit and Loss. The remaining amount of change in the fair value of liability is always recognised in Statement of Profit and Loss. Changes in fair value attributable to a financial liability's credit risk that are recognised in other comprehensive income are reflected immediately in retained earnings and are not subsequently reclassified to Statement of Profit and Loss.

17.9 Financial Liabilities subsequently measured at amortised cost

- i) Financial liabilities that are not held-for-trading and are not designated as at FVTPL are measured at amortised cost at the end of subsequent accounting periods. The carrying amounts of financial liabilities that are subsequently measured at amortised cost are determined based on the effective interest method. Interest expense that is not capitalised as part of costs of an asset is included in the 'Finance costs' line item.

17.10 Derecognition of Financial Liabilities

The Company derecognises financial liabilities when, and only when, the Company's obligations are discharged, cancelled or have expired. An exchange with a lender of debt instruments with substantially different terms is accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability. Similarly, a substantial modification of the terms of an existing financial liability (whether or not attributable to the financial difficulty of the debtor) is accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability. The difference between the carrying amount of the financial liability derecognised and the consideration paid and payable is recognised in Statement of Profit and Loss.

17.11 Offsetting of Financial Instruments

Financial assets and financial liabilities are offset and the net amount is reported in the Balance Sheet if there is a currently enforceable legal right to offset the recognised amounts and there is an intention to settle on a net basis, to realise the assets and settle the liabilities simultaneously.

17.12 Fair Value Measurement

The Company measures financial instruments, such as, derivatives at fair value at each balance sheet date. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:

- In the principal market for the asset or liability, or

- In the absence of a principal market, in the most advantageous market for the asset or liability.

The principal or the most advantageous market must be accessible by the Company.

The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The Company uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs.

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorised within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

Level 1 — Quoted (unadjusted) market prices in active markets for identical assets or liabilities

Level 2 — Valuation techniques for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable

Level 3 — Valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable

17.13 Reclassification of Financial Assets and Liabilities:

The Company determines classification of financial assets and liabilities on initial recognition. After initial recognition, no reclassification is made for financial assets which are equity instruments and financial liabilities. If the Company reclassifies financial assets, it applies the reclassification prospectively from the reclassification date which is the first day of the immediately next reporting period following the change in the business model. The Company does not restate any previously recognised gains, losses (including impairment gains or losses) or interest.

The following table shows various reclassification and the how they are accounted for:

Original Classification	Revised Classification	Accounting Treatment
Amortised cost	FVTPL	Fair value is measured at reclassification date. Difference between previous amortised cost and fair value is recognised in statement of profit and loss.
FVPTL	Amortised cost	Fair value at reclassification date becomes its new gross carrying amount. EIR is calculated based on new gross carrying amount.
Amortised cost	FVTOCI	Fair value is measured at reclassification date. Difference between previous amortised cost and fair value is recognised in OCI. No change in EIR due to reclassification.
FVTOCI	Amortised cost	Fair value at reclassification date becomes its new gross carrying amount. However, cumulative gain or loss in OCI is adjusted against fair value. Consequently, the asset is measured as if it had always been measured at amortised cost.
FVTPL	FVTOCI	Fair value at reclassification date becomes its new gross carrying amount. No other adjustment is required.
FVTOCI	FVTPL	Assets continue to be measured at fair value. Cumulative gain or loss previously recognised in OCI is reclassified to statement of profit and loss at the reclassification date.

For assets and liabilities that are recognised in the financial statements on a recurring basis, the Company determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period.

For the purpose of fair value disclosures, the Company has determined classes of assets and liabilities on the basis of the nature, characteristics and risks of the asset or liability and the level of the fair value hierarchy as explained above.

18 Dividend

18.1 The company has not declared any dividend for the F.Y. 2020-21



19 Others

- 19.1 The figures of the previous year have been regrouped and/or rearranged wherever considered necessary and/or practicable to make them comparable with those of the current year.
- 19.2 In the opinion of the Board, the current assets, loans and advances have a value on realization in the ordinary course of business at least equal to the amounts at which they are stated in the Balance Sheet and that the provision for known liability is adequate and not in excess of amount reasonably necessary.
- 19.3 "During the financial year under consideration, the company and the financial creditor [Bank of Baroda (before merger knows as Dena Bank)] had mutually agreed for an One Time Settlement ('OTS') Proposal for full and final settlement of the dues. As per the OTS, the company was required to repay a sum of Rs. 3,82,00,000/- in full and final settlement of its outstanding cash credit loan of Rs. 5,43,21,113/- and term loans aggregating to Rs. 5,20,29,853/-. As per the terms of the OTS, out of the total full and final settlement amount of Rs. 3,82,00,000/-, a sum of Rs. 3,00,00,000/- was to be settled against the entire cash credit loan of Rs. 5,43,21,113/- and the balance amount of Rs. 82,00,000/- was to be settled against the Demand Loans of Rs. 5,20,29,853/-.

Accordingly, in the case of cash credit loan facilities, the difference between the outstanding loan amount and its final settlement amount, has been recognized as income of the current year by the company, under Note-19 to the Audited Financial Statements. Likewise, for the Demand Loan facilities, the difference between the outstanding demand loans and its final settlement amount, has been recognized as 'Capital Reserve' by the company, under Note 12 to the Audited Financial Statements. "

STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31ST MARCH, 2021
A. Equity Share Capital

Balance at the beginning of the reporting period as on 1 st April 2019	Changes in Equity Share Capital during the year 2019-20	Balance at the end of the reporting period as on 31 st March 2020
51,341,000	-	51,341,000

Balance at the beginning of the reporting period as on 1 st April 2020	Changes in Equity Share Capital during the year 2020-21	Balance at the end of the reporting period as on 31 st March 2021
51,341,000	-	51,341,000

B. Other Equity

Particulars	Reserves and Surplus	Other Comprehensive Income	Total other Equity
	Retained earning		
Balance at the beginning of the reporting period as on 1st April, 2019	(113,092,119)	-	(113,092,119)
Profit / (Loss) for the Year 2019-20	(13,114,497)	-	(13,114,497)
Other comprehensive income for the year 2019-20	-	-	-
Balance at the end of the reporting period ended as on 31st March, 2020	(126,206,616)	-	(126,206,616)

Particulars	Reserves and Surplus	Other Comprehensive Income	Total other Equity
	Retained earning		
Balance at the beginning of the reporting period as on 1st April, 2020	(126,206,616)	-	(126,206,616)
Profit / (Loss) for the Year 2020-21	1,208,097	-	1,208,097
Other comprehensive income for the year 2020-21	-	-	-
Balance at the end of the reporting period ended 31st March, 2021	(124,998,518)	-	(124,998,518)

AS PER OUR REPORT OF THE EVEN DATE

S N GADIYA & CO.

CHARTERED ACCOUNTANTS

PLACE : INDORE

DATED : AUGUST 14TH, 2021

For and on behalf of the Board of Directors

Pithampur Poly Products Limited

MANAGING DIRECTOR

DIRECTOR

PROPRIETOR

M.NO. 071229



ATTENDANCE SLIP

..... ANNUAL GENERAL MEETING ON

R.F. No. _____

Mr./Mrs./Miss _____

(Shareholders' name in block letters)

I/We certify that I/We am/are registered shareholder / proxy for the registered shareholder of the company.

I/We hereby record my/our presence at the 24 Annual General meeting of the company at Thursday, 30th September 2021, at 3.00 p.m. at its Registered Office 115, Industrial Area, Sector III, Pithampur, Dist. Dhar (MP),

(If signed by proxy, his/her name should be written in block letters)

(Shareholders/proxy's Signature)

Note:

1. Shareholders / proxy holders are requested to bring the attendance Slips with them when they come to the meeting and hand over them at the entrance after affixing their signatures on them.
2. If it is intended to appoint a proxy, the form of proxy should be completed and deposited at the Registered Office of the Company at least 48 hours before the Meeting.



PROXY FORM
FORM MGT-11

[Pursuant to section 105(6) of the Companies Act, 2013 and rule 19(3) of the Companies (Management and Administration) Rules, 2014]

Name : PITHAMPUR POLY PRODUCTS LIMITED
CIN : L25202MP1994PLC008513
Regd. Office : 115, Sector – III, Industrial Area, Pithampur, Dist. Dhar (MP)

Name of the member(s) :
Registered address :
E-mail Id :
Folio No/ Client Id :
DPID :

I/We, being the member(s) of.....shares of the above named company, hereby appoint

- 1. Name :..... E-mail Id :
Address :..... Signature :.....,
or failing him
- 2. Name :..... E-mail Id :
Address :..... Signature :.....,
or failing him

as my/our proxy to attend and vote on a poll for me/us and on my/our behalf at the 24 Annual general meeting of the company, to be held on Thursday, 30th September 2021, at 3.00 p.m. at its Registered Office 115, Industrial Area, Sector III, Pithampur, Dist. Dhar (MP), and at any adjournment thereof in respect of such resolutions as are indicated below:

Resolutions

- 1. Consider and adopt Audited Statement of accounts, Reports of the Board of Directors and Auditor.
- 2. Re-appointment of Mr. Vishwanath Knungo
- 3. Rectification of Auditor M/s S.N. Gadia & Co.
- 4. Increase in remuneration of Mr. R.K. Tekriwal as Managing Director
- 5. Revision in overall borrowing powers of the Company
- 6. Creation of Mortgage / Charge on the assets of the Company
- 7. Approval for Related Party Transactions

Signed this..... day of.....2021
Signature of shareholder

Affix
Revenue
Stamp here

Signature of Proxy holder(s)

Note: This form of proxy in order to be effective should be duly completed and deposited at the Registered Office of the Company, not less than 48 hours before the commencement of the Meeting.

BOOK- POST

 **PITHAMPUR POLY PRODUCTS LIMITED**

CIN:L25202MP1994PLC008513

Regd. Office:115, Sector – III, Industrial Area, Pithampur, Dist. Dhar (MP)