

Shri Jagdamba Polymers Limited

Regd. Office : "HARMONY", 4th Floor, 15/A, Shree Vidhyanagar Co-Op. Hsg. Soc. Ltd., Opp. NABARD,
Nr. Usmanpura Garden, Usmanpura, Ahmedabad - 380014 (INDIA)
Tele. No. +91-79-26565792 , E-mail ID - admin@jagdambapolymers.com & gst@jagdambapolymers.com
CIN - L17239GJ1985PLC007829 & GST No.- 24AACCS1262K1ZH



Date: May 30, 2024

To,
BSE Limited
Corporate Relationships Department
1st Floor, New Trading Ring,
Rotunda Building, Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001

BSE Code: 512453

Dear Sir/ Madam,

Sub: Annual Secretarial Compliance Report for the year ended on March 31st, 2024

Ref: Regulation 24A of the SEBI (LODR) Regulations, 2015

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report issued by G R Shah & Associates, Practicing Company Secretaries, for the year ended on March 31st, 2024.

Kindly take note of the same and update the records of the Company accordingly.

Thanking you
FOR SHRI JAGDAMBA POLYMERS LIMITED

Ramakant Bhojnagarwala
Managing Director
DIN: 00012733
Enclosures: As above



Secretarial compliance report of Shri Jagdamba Polymers Limited for the year ended 31st March, 2024

I Gaurang R Shah (Company Secretary) have examined:

- all the documents and records made available to us and explanation provided by **SHRI JAGDAMBA POLYMERS LIMITED** ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended **31st March, 2024** ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable during the audit period)**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable during the audit period)**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable during the audit period)**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable during the audit period)**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable during the audit period)**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- circulars / guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period the compliance status of the listed entity is appended below;

Sr. No	Particulars	Compliance status (Yes/ No/ NA)	Observations/ Remarks by PCS
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1.	<u>Secretarial Standard</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	
2.	<u>Adoption and timely updation of the Policies:</u> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	
3.	<u>Maintenance and disclosures on Website:</u> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website	Yes	
4.	<u>Disqualification of Director:</u> None of the Director of the	Yes	





	Company are disqualified under Section 164 of Companies Act, 2013		
5.	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	The Company does not have any subsidiary
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015	Yes	
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	Yes	





9.	<p><u>Disclosure of events or information:</u></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	
10.	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	No	<p>Delay in compliance with provisions of Reg. 3(5) and /or Regulation 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to Structured Digital Database.</p>
11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder</p>	Yes	<p>The details of action taken by SEBI or Stock Exchange against the company are mentioned below.</p>





12.	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	No	The Company has made the non-compliances, the details of which are mentioned below.
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Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019: **Not Applicable**

Sr. No	Particulars	Compliance status (Yes/ No/ NA)	Observations/ Remarks by PCS
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	No appointment or re-appointment during the period under review.
	ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	NA	
	iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	
2.	Other conditions relating to resignation of statutory auditor		





<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor</p> <p>ii. Disclaimer in case of non-receipt of information:</p>	NA	There has been no such instance where the listed entity has not provided information or shown non-cooperation to the auditor for the Information required by them.
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(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

S. No.	Compliance Requirement (Regulations/ Circulars including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action (Advisory/Clarification/Fin e/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observation s/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Appointment of Qualified Company Secretary as Compliance Officer	Regulation 6 of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015	The Company has not filled the vacancy caused by the resignation of Company Secretary within three months from the date of such vacancy.	BSE	Fine	The Company has not filled the vacancy caused by the resignation of Company Secretary within three months from the date of such vacancy.	Under Regulation 6(1): 56,640	The Company has paid the fine of Rs. 56,640/- and appointed the Qualified Company Secretary as Compliance Officer w.e.f 04th January, 2024	The company has made payment of a fine of Rs. 56,640/- vide Invoice dated 18/03/2024	-

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2	Maintenance of Structured Digital Database	Regulation 3(5) and Regulation 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	The company is non-compliant with provisions of Reg. 3(5) and /or Regulation 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to Structured Digital Database.	BSE	Exchange has displayed the company as non-compliant with SDD and also mentioned the name of Compliance Officer under the Get Quote page of the Exchange Website of the	Delay in compliance with provisions of Reg. 3(5) and /or Regulation 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to Structured Digital Database.	-	Delay in compliance with provisions of Reg. 3(5) and /or Regulation 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to Structured Digital Database.	The company has clarified that the required software to record and maintain the Unpublished Price Sensitive Information (UPSI) was installed, the required entries to record the flow of UPSI in and outside the organization were made and a certificate certifying the
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				Listed Entity				
3	Corporate Announcement regarding Change in Key Managerial Personnel and Compliance Officer- Intimation	Regulation 30 of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015	The Company didn't file the Resignation Letter of Mr. Kunjal Soni, Company Secretary and Compliance Officer of the Company in the		The Company didn't file the Resignation Letter of Mr. Kunjal Soni, Company Secretary and Compliance Officer of the Company in the Announcement require to be filed		The Company revised the Announcement to be filed with the Stock Exchange under Regulation	The compliance with the applicable provisions was obtained from a the Practicing Company Secretary and submitted to the Stock Exchange where the shares of the company are listed.

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Patel Colony,



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	and SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023	Announcement require to be filed under Regulation 30 with the Stock Exchange.	under Regulation 30 with the Stock Exchange.			30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and attached in that Resignation Letter of Mr. Kunjal Soni as per the SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023	and Compliance Officer- Intimation required to be filed under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements, 2015 and attached the Resignation Letter of Mr. Kunjal Soni in it.
4	Regulation 31(4) of SEBI (Substantial	The promoters of the company has not made the disclosure	The promoters of the company has not made the disclosure under Regulation 31(4)			The promoters of the company made	The company has duly made the disclosure

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Colony,



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Acquisition of Shares & Takeovers Regulations, 2011	under Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 within seven working days from the end of financial regarding non-encumbrance of shares other than those already disclosed during the financial year.	of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 within seven working days from the end of financial regarding non-encumbrance of shares other than those already disclosed during the financial year.	disclosure under Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 within seven working days from the end of financial regarding non-encumbrance of shares other than those already disclosed during the financial year on 13 th April, 2024.	under Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 on 13/04/2024 given the mishap in internal compliance timelines.



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

S r No	Compliance Requirement (Regulations/ Circulars / guidelines including specific clause)	Regulation /Circular No.	Deviations	Actio n Take n by	Type of Action (Advis ory/Clas sification/ on/Fin e/Show Cause Notice/ Warnin g, etc.)	Details of Violation	Fine Amount	Observation s/Remarks of the Practicing Company Secretary	Management Response	R e m a r k s
NIL										

FOR, GR SHAH & ASSOCIATES
Company Secretaries



Gaurang Shah
Proprietor
C.O.P. No. 14446
FCS No. 12870
UDIN: F012870F000499103
Peer Review No.: 661/2020

Place: Ahmedabad
Date: 30th May, 2024

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