



# GINNI FILAMENTS LIMITED

CIN : L71200UP1982PLC012550

CORPORATE OFFICE: D-196, SECTOR-63, NOIDA-201 307, INDIA

Ph : + 91-120-4058400 (30 LINES)

Email:secretarial@ginnifilaments.com, Website : www.ginnifilaments.com

May 20, 2024

National Stock Exchange of India Ltd. Exchange Plaza, 5 <sup>th</sup> Floor, Bandra Kurla Complex, Bandra (East) <b>MUMBAI – 400 051</b>	BSE Limited Phiroze JeeJeeBhoy Towers, Dalal Street, MUMBAI – 400 051
<b>SCRIP CODE: GINNIFILA</b>	<b>SCRIP CODE: 590025</b>

**SCRIP CODE : GINNIFILA**

**Sub. : Secretarial Compliance Report**

Dear Sir(s),

In compliance with the Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, we enclose herewith a copy of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2024 issued by M/s. Parveen Rastogi & Co., Company Secretaries.

Kindly take the Same on records.

Thanking You,

Yours Faithfully,

**For GINNI FILAMENTS LIMITED**

**BHARA** Digitally signed by  
BHARAT SINGH  
Date: 2024.05.20  
**T SINGH** 17:03:05 +05'30'

**BHARAT SINGH**  
**COMPANY SECRETARY & COMPLIANCE OFFICER**

Encl : As above



# Parveen Rastogi & Co.

## Company Secretaries

### **SECRETARIAL COMPLIANCE REPORT OF M/S GINNI FILAMENTS LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2024**

I, Parveen Kumar Rastogi, Proprietor of M/s Parveen Rastogi & Co., Practicing Company Secretaries, have examined:

- All the documents and records made available to me and explanations provided by M/s Ginni Filaments 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 31<sup>st</sup> 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 there under; 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 to the Company during the Reporting Period}**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



**Head Off. : Flat No. 3, Sood Building, Teil Mill Marg, Ram Nagar, Paharganj, New Delhi-110055**

**Branch Off. : CS-54 & 55, 1st Floor, Ansal Plaza, Vaishali, Ghaziabad - 201010**

**Residence : 109-C, Pocket-F, MIG Flats, GTB Enclave, Dilshad Garden, Delhi - 110093**

**(O) : 0120-4323445, Mobile : 98112-13445, E-mail : rastogifcs3@hotmail.com, rastogifcs3@gmail.com**

**Web : csparveenrastogi.com**

- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **{Not Applicable to the Company during the Reporting Period}**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 **{Not Applicable to the Company during the Reporting Period}**
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021. **{Not Applicable to the Company during the Reporting Period}**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- i) SEBI (Delisting of Equity Shares) Regulations, 2021 **{Not Applicable to the Company during the Report Period}**
- j) SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- k) Other regulations as applicable and circulars/guidelines issued there under;

**And based on the above examination, I hereby report that, during the review period:**

- a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder,

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation/Circular No.	Deviations	Action taken by	Type of Action	Details of violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
Not Applicable.										



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

Sr. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action taken by	Type of Action	Details of violation	Fine Amount	Observations/Remarks of the Practising Company Secretary	Management Response	Remarks
<b>Not Applicable.</b>										

**Additional Affirmations:**

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
1.	<u>Secretarial Standard:</u> The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	Yes	None
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 Yes	None
3.	<u>Maintenance and disclosures on Website:</u> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website.	Yes Yes Yes	None
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	None



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	Yes Not Applicable	None
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	None
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	None
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 Not Applicable	None
9.	<u>Disclosure of events or information:</u> 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.	Yes	None
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> 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	Not Applicable	None
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> In case of resignation of statutory auditor from the listed entity or any of its material	Not Applicable	There was an appointment of Statutory



	subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.		Auditor for a term of 5 years in the Annual General Meeting held on 28 <sup>th</sup> September, 2022.
13.	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Not Applicable	None

**Assumptions & limitation of scope and review:**

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

**FOR PARVEEN RASTOGI & CO.  
(COMPANY SECRETARIES)**

**PARVEEN KUMAR RASTOGI  
(PROPRIETOR)**

**M. NO.: F4764**

**COP. NO.: 26582**

**PR No. : 5486/2024**

**PLACE: NEW DELHI**

**DATE: 06.05.2024**

**UDIN: F004764F000317661**