

20th October, 2024

To,
The Dept. of Corporate Services
The Bombay Stock Exchange Ltd.
P. J. Towers, Dalal Street,
Mumbai – 400 001

SUB.: Non-applicability of Disclosure under Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015- Disclosure of Related Party Transactions on a consolidated basis for the half year ended September 30, 2024.

Ref.: Scrip Code No. 530401

Dear Sir/Madam,

With reference to the captioned subject matter, it is here by clarified that pursuant to provisions of Regulation 15(2)(a) of SEBI (LODR) Regulations, 2015. The compliances with the Corporate Governance provisions as specified in regulations 17, 17A, 18, 19, 20, 21, 22, 23, 24, 24A, 25, 26, 27 and clauses (b) to (i) of sub-regulation(2) of regulation 46 and Para C,D, and E of schedule V shall **not apply** in respect of the listed entity having paid up equity share capital **not exceeding Rs 10 Cr, and Net worth not exceeding Rs 25 Cr**, as on the last day of the previous financial year or the listed entity which has listed its specified securities on the SME Exchange.

In consideration of the said provisions, our Company is having a paid-up share capital is Rs. 4,31,90,000 which is below the threshold limit of Rs. 10.00 Crore and having a net worth is Rs. 30,22,34,860 as on the last day of the previous financial year. As per the Order passed by Securities Appellate Tribunal (SAT) at Mumbai, dated 26th September, 2024, both the limit must be exceeded for applicability of Corporate Governance Provision.

Therefore, Regulation 15(2) and provision of Regulation 23(9) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended are not applicable to our Company.

Hence, Our Company is not required to submit “Disclosure of Related Party Transactions on a Consolidated basis for the half year ended March 31, 2013 as required under Regulation 23(9) of the SEBI (LODR) Regulations, 2015”.

Kindly take the same on record.

For, Vinyoflex Limited

(VINODKUMAR KHIMJI TILVA)
Managing Director
DIN: 00275279



VINYOFLEX LIMITED