

Date: 24th May, 2022

To,

<p>The Listing Department BSE Limited P. J. Towers, Dalal Street, Mumbai – 400 001 Fax : 02222722037 Email : corp.relations@bseindia.comp</p> <p>Scrip Code: 533301</p>	<p>The Listing Department National Stock Exchange of India Limited Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051 Fax : 02226598237/38 Email : cmlist@nse.co.in</p> <p>Scrip Symbol: SPYL</p>
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Sub : Certificate under Regulation 24A of the LODR (Listing Obligations and Disclosure Requirements) Regulations, 2018 for the year Ended on 31.03.2022

Please find enclosed herewith the Certificate for Annual Secretarial Compliance Report received from GMJ & Associates, Company Secretaries under Regulation 24A of the LODR (Listing Obligation and Disclosure Requirements) Regulations, 2018 for the year Ended on 31.03.2022.

Kindly take it on your record and oblige.

Thanking You,

Yours truly,

For Shekhawati Poly-Yarn Limited



Meena Agal
Company Secretary & Compliance Officer



Shekhawati Poly-Yarn Ltd.

Registered Office

Survey No. 185/1, Near Kanadi Phatak, Village - Naroli, Silvassa, D & N. H. -396 235, India
72260 71555 Email : info@shekhawatiyarn.com CIN : L17120DN1990PLC000440 GST : 26AABCS5224N1Z6

Corporate Office

Express Zone 'A' Wing, Unit No. 1102/1103, 11th Floor, Near Patel Vatika, off W. E. Highway,
Malad East, Mumbai-400097, Maharashtra, India GST : 27AABCS5224N2Z3

+ 91 22 6236 0800 / 6694 0626 Email : ho@shekhawatiyarn.com www.shekhawatiyarn.com

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ISO certified company

SECRETARIAL COMPLIANCE REPORT OF SHEKHAWATI POLY-YARN LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2022
(Pursuant to Regulation 24A of SEBI (Listing Obligations and
Disclosure Requirements) Regulations, 2015)

To,
The Members,
Shekhawati Poly-Yarn Limited
Plot No. 185/1, Naroli Village,
Near Kanadi Phatak,
Dadra & Nagar Haveli- 396 235

We, GMJ & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by SHEKHAWATI POLY-YARN LIMITED ("the listed entity"), bearing CIN: L17120DN1990PLC000440;
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2022 ("Review Period") in respect of compliance with the provisions of:

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

[Cont...2]



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

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable to the company during the review period).
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018; (Not applicable to the company during the review period).
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the company during the review period).
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the company during the review period).
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the company during the review period);
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;

and circulars/guidelines issued thereunder;

and based on the above examination, we 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, except in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NIL			

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.

(c) The following are the details of actions taken against the listed entity/its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/ Remarks of the Practicing Company Secretary, if any
NIL				



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

Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The provisions of Regulation 17(1)(c) of the SEBI (LODR) Regulations, 2015 pertaining to composition of Board of Directors of the Company were complied with by the company on 26 th August, 2020.	31 st March, 2021	The Company has complied with Regulation 17(1)(c) of the SEBI (LODR) Regulations, 2015 on 26 th August, 2020. Further, the Company had filed an application to NSE for waiver of fine imposed on the company and its Promoters. However, the application was not considered favorably by NSE. Hence, aggrieved with the decision of the empaneled Committee of the NSE, the Company has filed an appeal before the Securities and Appellate Tribunal (SAT) under Regulation 23L of The Securities Contract (Regulations) Act, 1956.	The matter is pending with Securities and Appellate Tribunal (SAT)

For GMJ & ASSOCIATES
Company Secretaries

haheshwari

[CS PRABHAT MAHESHWARI]
PARTNER

M. No. : FCS 2405
COP No. : 1432
UDIN : F002405D000368870

PLACE : MUMBAI
DATE : 23RD MAY, 2022

