



PRAGNYAP RAOHAN & ASSOCIATES
PRACTICING COMPANY SECRETARIES

Secretarial compliance report of Jindal Poly Investment And Finance Company Limited for the year ended 2020-21

I Pragnya Parimita Pradhan, Company Secretary in whole time practice, have examined:

- (a) all the documents and records made available to us and explanation provided by Jindal Poly Investment And Finance Company Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (e) 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 March 31, 2021 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");

The specific Regulations, whose 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;
- (e) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder; and based on the above examination, I hereby report that, during the Review Period:



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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:-

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

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

- (e) 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. No.	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.
-----fJIL-----				

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

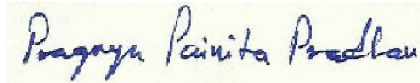
Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ... {The years are to be mentioned}	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
----- fNot Applicable-----				



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- (e) During the year under review no appointment/ re-appointment/ resignation of statutory auditor of the Company had occurred. However, the Company has appointed the statutory auditor in place of the retiring auditor in the Annual General Meeting held for the financial Year 2018-19 and issued the appointment letter dated 5th October, 2019 to the Auditor. Further, in compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Vide Circular No. CIR/CFD/CMD1/11472019 dated October 18, 2019, the Company has issued an addendum to the appointment letter dated 5th October, 2019 on 5th May, 2020.



Name: Pragya Parimita Pradhan

ACS No: A32778

CP No: 12030

UDIN: A032778C000342065

Place: New Delhi

Date: 21-05-2021

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