



**PEARL**  
**Polymers Limited**

**PET**  
POLYETHYLENE TEREPHTHALATE  
**JARS**  
**BOTTLES**

**Regd. Off.** : A-97/2, Okhla Industrial Area, Phase-II, New Delhi-110020, India  
**CIN NO.** : L25209DL1971PLC005535  
**Tel. No.** : +91-11-47385300, **Fax**, +91-11-47480746  
**Email** : [pearl@pearlpet.net](mailto:pearl@pearlpet.net), **Website**: [www.pearlpet.net](http://www.pearlpet.net)

PPL/SD/LODR/2019

15<sup>th</sup> May, 2019

**ONLINE SUBMISSION**

<b>The Manager, Listing Department National Stock Exchange of India Ltd.</b> Exchange Plaza, 5 <sup>th</sup> Floor Plot No. C1, G Block Bandra, Kurla Complex Bandra (East), Mumbai- 400051  <b>(Stock Code: PEARLPOLY)</b>	<b>The Manager, Listing Department BSE Ltd.</b> Phiroze Jeejeebhoy Towers, 25 <sup>th</sup> Floor, Dalal Street, Mumbai-400001  <b>(Stock Code: 523260)</b>
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**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2019**

**Re: Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015**

**Dear Sir/ Madam,**

With reference to the subject captioned above and in compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, kindly find enclosed herewith copy of Annual Secretarial Compliance Report dated May 15, 2019 for the year ended March 31, 2019, as issued by Ms. Rashmi Sahni, Practising Company Secretary.

We request you to kindly take the above information on record.

Thanking you,

Yours faithfully,

**For Pearl Polymers Limited**

**Priyanka**  
**Company Secretary & Compliance Officer**  
**M: No: ACS 36870**



**Secretarial Compliance Report of Pearl Polymers Limited  
for the year ended March 31,2019**

I Rashmi Sahni, have examined:

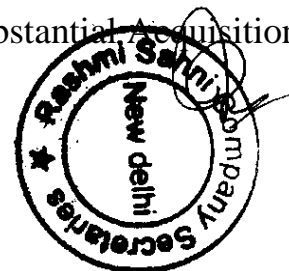
- (a) all the documents and records made available to us and explanation provided by Pearl Polymers Limited, CIN: L25209DL1971PLC005535 (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2019 (“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”);

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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- (i) Any other regulations, circulars etc. issued by SEBI applicable to the Company.

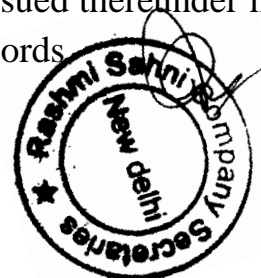
and circulars/ guidelines issued thereunder;

and based on the above examination, I/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, However regulations mentioned above under clause (b), (d), (e), (f) and (g) are not applicable to the company during the review period; 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
<b>Not Applicable</b>			

- (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



- (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:

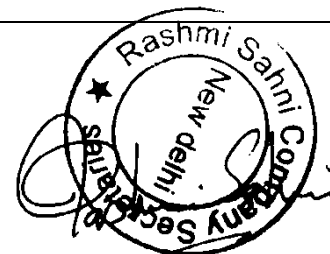
<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/ remarks of the Practicing Company Secretary, if any.</b>
<b>Not Applicable</b>				

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

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended...</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
<b>Not Applicable</b>				

**Place: New Delhi**

**Date: 14.05.2019**



**Rashmi Sahni**  
**ACS No.: 25681**  
**C P No.: 10493**