



POLSON LTD

Date: 30.05.2022

Manufacturers & exporters of eco friendly tannin extracts & leather chemicals since 1906

To
BSE Ltd.
Phiroze Jeejeebhoy
Towers, Dalal Street,
Mumbai 400 001

Sub: Annual Secretarial Compliance Report of Polson Limited (Security Code: 507645) for the year ended March 31, 2022

Reference:- SEBI circular no. CIR/CFD/CMDI/27/2019 dated February 08, 2019

Dear Sir/Madam,

In terms of clause 3(b)(iii) of the above referred SEBI circular, we are submitting the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2022, issued by Mr. Mihen Halani, Practicing Company Secretary and Secretarial Auditor of the Company.

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

Thanking You.

For Polson Ltd



Sampada Sawant
Company Secretary & Compliance Officer

MIHEN HALANI & ASSOCIATES

Practicing Company Secretaries

A-501/L, Jaswanti Allied Business Centre, Kachpada, Ramchandralane Extn. Rd,
Malad (West), Mumbai – 400 064, ☎: 022 – 6236 0279 ✉: mihenhalani@gmail.com

**Annual Secretarial Compliance Report of Polson Ltd
for the year ended March 31, 2022**

To,
The Board of Directors,
POLSON LTD
CIN: L15203PN1938PLC002879
Ambaghat Talluka, Shahuwadi,
Kolhapur, MH-415 101, IN
BSE Scrip Code: 507645/ ISIN: INE339F01021

We, M/s. Mihen Halani & Associates have examined:

- a) all the documents and records made available to us and explanation provided by Polson Ltd (“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, 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”);

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) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - **Not Applicable during the period under review;**
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015-;
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - **Not Applicable during the period under review;**

- f) The Securities and Exchange Board of India (Issue and Listing Of Non-Convertible Securities) Regulations, 2021 - **Not Applicable during the period under review;**
- g) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 - **Not Applicable to the listed entity during the period under review;**
- i) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **Not Applicable to the listed entity during the period under review, and**
- j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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

- i. The listed entity has complied with all 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
1.	Regulation 46 of the SEBI (LODR) Regulations, 2015	Maintenance of Website	The Listed entity has not maintained functional website properly as required under Regulation 46(2) of the SEBI (LODR) Regulations, 2015.
2.	PART C of the Schedule II of the SEBI (LODR) Regulations, 2015	Internal Audit Report for the financial year 2021-22	The Listed entity has not appointed Internal Auditor for the financial year 2021-22.

- ii. The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder insofar as it appears from our examination of those records.
- iii. 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.
Not Applicable				

- iv. The listed entity has taken the following actions to comply with 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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Listed entity has not maintained functional website properly as required under Regulation 46(2) of the SEBI (LODR) Regulations, 2015.	2020-21	The listed entity is taking proper measures and action in order to comply with the regulations	The entity is still in process of complying with the Regulation 46(2) of the SEBI (LODR) Regulations, 2015.
2.	Internal Audit Report for the financial year 2021-22	2020-21	The Listed entity is in due process of appointing new Internal Auditor of for F.Y.2021-22.	The entity is still in process of complying with PART C of the Schedule II of the SEBI (LODR) Regulations, 2015.

Date: 30.05.2022
Place: Mumbai
UDIN: F009926D000426573

For MIHEN HALANI & ASSOCIATES
Practicing Company Secretary


 Mihen Halani
 (Proprietor)
 CR No: 12015
 FCS No: 9926

