



**PEARL**  
**Polymers Limited**

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

Regd. Office : A-97/2, Okhla Industrial Area, Phase II, New Delhi-110020, INDIA

CIN No. : L25209DL1971PLC005535

Tel. No. : +91-11-47835300

Email : pearl@pearlpet.net, Website: www.pearlpet.net

May 27, 2022

<b>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  (Stock Code: PEARLPOLY)	<b>BSE Ltd.</b> Phiroze Jeejeebhoy Towers, 25 <sup>th</sup> Floor, Dalal Street, Mumbai-400001  (Stock Code: 523260)
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Dear Sir/Madam,

**Sub: Annual Secretarial Report for the year ended March 31, 2022**

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

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing the Annual Secretarial Compliance Report for the financial year 2021-22 dated 16.05.2022, issued by Ms. Rashmi Sahni, Practicing Company Secretary.

We request you to kindly take the same on record.

Thanking you,

Yours faithfully,  
For Pearl Polymers Limited

Sanjeev Rikhi

CFO

Encl: As above



**Secretarial Compliance Report of Pearl Polymers Limited**  
**for the year ended March 31, 2022**

I, **Rashmi Sahni**, Practicing Company Secretary 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 and information/clarification provided by the management of the Company, 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) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018: Not Applicable to the Company during the financial year under review
- (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; Not Applicable to the Company during the financial year under review
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (repealed w.e.f. 13<sup>th</sup> August 2021 ) / Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (notified on 13<sup>th</sup> August 2021) ; Not Applicable to the Company during the financial year under review.



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (repealed w.e.f. 9<sup>th</sup> August 2021) / Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021(notified on 9<sup>th</sup> August 2021); Not Applicable to the Company during the financial year under review
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013(repealed w.e.f. 9<sup>th</sup> August 2021) / Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021(notified on 9<sup>th</sup> August 2021); Not Applicable to the Company during the financial year under review
- (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
Not Applicable			

- (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 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:

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				



- (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 March 31, 2022	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

**Place: New Delhi**  
**Date: 16.05.2022**



**Rashmi Sahni**  
**Practicing Company Secretary**  
**ACS No: 25681**  
**CP No. 10493**  
**UDIN: A025681D000326971**

My report of even date is to be read along with this letter.

I have been engaged by Pearl Polymers Limited (hereinafter referred to as 'the Company') whose Equity Shares are listed on National Stock Exchange of India Limited and BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and to issue the Annual Secretarial Compliance Report thereon.

**Management's Responsibility:**

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

**Auditor's Responsibility:**

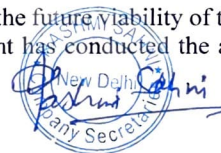
My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

I have verified the correctness and appropriateness of the documents and information as available in the public domain and lack of physical verification due to change in Compliance officer in short time span, wherever required. I have obtained the Management Representation about the compliance of laws, rules and regulations and happening of events etc.

The Compliance of the provisions of corporate and other applicable laws, and regulations, standards is the applicability of management. My examination was limited to the verification of procedures on test basis.

**Disclaimer:**

The Secretarial Compliance Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.



**Place: New Delhi**  
**Date: 16.05.2022**

**Rashmi Sahni**  
**Practicing Company Secretary**  
**ACS No: 25681**  
**CP No. 10493**  
**UDIN: A025681D000326971**