



# POLO QUEEN INDUSTRIAL AND FINTECH LIMITED

Regd. Off : 303/4/5, A to Z Industrial Premises, G. K. Marg, Lower Parel (W),  
Mumbai - 400013 (India)

CIN NO. L72200MH1984PLC094539

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21<sup>st</sup> July, 2020

## **BSE Limited**

1<sup>st</sup> Floor, New Trading Wing,  
Rotunda Building, P. J. Towers,  
Dalal Street, Fort,  
Mumbai – 400001.

**Scrip Code:** 540717

## **Metropolitan Stock Exchange of India Ltd**

Vibgyor Towers, 4<sup>th</sup> Floor,  
Plot No.C-62, G- Block,  
Bandra-Kurla Complex,  
Bandra (East), Mumbai – 400098.

**Symbol:** PQIF

**Subject:** Submission of Secretarial Compliance Report for the Financial Year ended 31<sup>st</sup>  
March, 2020

Dear Sir,

In compliance with SEBI Circular No. CIR/CFD/CMDII27/2019 dated February 8, 2019, please find enclosed Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the Financial Year 2019-20 issued by Mrs. Grishma Khandwala, Practicing Company Secretary.

We request you to take the same on record and acknowledge receipt.

Thanking you,

Yours truly,

**For Polo Queen Industrial and Fintech Limited**

**Vandana Yadav**  
**Company Secretary**

**Encl:** As Above

ANNUAL SECRETARIAL COMPLIANCE REPORT OF POLO QUEEN INDUSTRIAL AND  
FINTECH LIMITED UNDER REGULATION 24A of SEBI (LISTING OBLIGATIONS AND  
DISCLOSURE REQUIREMENT), REGULATIONS 2015,  
FOR THE YEAR ENDED 31<sup>st</sup> MARCH, 2020

To,  
Polo Queen Industrial and Fintech Limited  
304, A to Z Industrial Estate,  
Ganpatrao Kadam Marg,  
Lower Parel,  
Mumbai – 400013

With respect to Polo Queen Industrial and Fintech Limited, having CIN No. L72200MH 1984PLC094539 ('the listed entity'), I have examined, for the year ended 31<sup>st</sup> March, 2020 ('Review Period')

- (a) All the documents and records made available to me
- (b) The filings/ submissions made by the listed entity to the stock exchanges;
- (c) Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

and as per the explanations provided by the listed entity, in respect of compliance with the provision of :

- (a) The Securities and Exchange Board of India Act, 1992 ('SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) The Securities Contract (Regulation) Act, 1956 ('SCRA'), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by 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 Requirement) Regulation, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) Regulation 2015;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulation, 2018; (not applicable to the Company during the Review Period)
- (e) Securities and Exchange Board of India (Share Based Employees Benefits) Regulation, 2014; (not applicable to the Company during the Review Period)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulation, 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) Regulation, 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, 1996/2018;

and circulars / guidelines issued thereunder;

and based on the above examination, I 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 insofar as it appears from my 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,
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 (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
NOT APPLICABLE				

*Grishma Khandwala*  
Company Secretary

7/4, Indian Mercantile Mansions,  
Madam Cama Road, Mumbai - 400 039.  
Telephone : 2202 1256  
Mobile : 98201 21028  
E-mail : gkhandwala@yahoo.com

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**GRISHMA S. KHANDWALA**  
**COMPANY SECRETARY CP 1500**  
**7, ORIENTAL MANSIONS,**  
**MADAM CAMA ROAD,**  
**MUMBAI 400 039 TEL 22021256**

*gkhandwala*

**GRISHMA KHANDWALA**  
Company Secretary  
C.P. No. 1500  
7, Oriental Mansions,  
Madam Cama Road,  
Mumbai 400 039.

UDIN: A006515B000485268

Place: Mumbai  
Date: 21<sup>st</sup> July, 2020