

SUPREME PETROCHEM LTD

Read. Office:

Solitaire Corporate Park, Building No. 11, 5th Floor, 167, Guru Hargovindji Marg, Andheri-Ghatkopar Link Road, Chakala, Andheri (East), Mumbai-400 093. INDIA ©: 91-22-6709 1900 Fax - 022 - 4005 5681 • CIN: L23200MH1989PLC054633 Website: www.supremepetrochem.com • Email: corporate@spl.co.in

Ref: CFA/CS/18/AGM_35/2024-2025

September 16, 2024

BSE Limited
Phiroze Jeejeebhoy Towers,
1st Floor, Dalal Street, Mumbai - 400 001

Scrip Code - 500405

National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex Bandra East, Mumbai – 400 051 Scrip Code - SPLPETRO

Ref: Email of BSE dated 13.09.2024 related to imposing of fine of Rs. 11800/- on Company due to

non-submission of voting results within the period provided under Regulation 44(3) SEBI

(LODR) Regulations, 2015.

Sub: Application for withdrawal/waiver of fine along with disclosure under Regulation 30 of SEBI

(LODR) Regulations, 2015.

BUREAU VERITAS

Dear Sir,

Please refer to your subject e-mail received by the Company on 13.09.2024 wherein you have informed about the non-compliance of the Company related to non-submission of voting results within the period provided under Regulation 44(3) SEBI (LODR), Regulation, 2015 and consequently imposing a fine of Rs.11800/- on the Company

In this regard, we would like to inform your goodself that the Postal Ballot viz. e-voting with regard to passing of Special Resolution related to approval for appointment of four new independent directors viz. Prof. (Dr.) Anup Kumar Ghosh, Shri Basavaraj Ningappa Bankapur, Dr. Sanjay Rangrao Chougule and Ms. Rita Amitabh Teaotia was carried out by the Company between July 25, 2024 and August 23, 2024 and the e-voting period ended on August 23, 2024 Company had two working days' time to file the voting results under the provisions of Regulation 44(3) so it could have filed voting results with the stock exchanges upto 26.08.2024. Despite such leeway available, Company immediately filed the voting results on 23.08.2024 at 8.46 p.m. in both XBRL and PDF mode. (Copy of acknowledgments attached as annexure A), wherein inadvertently Company had mentioned the meeting date in XBRL mode appeared as 19.07.2024 in lieu of 23.08.2024 though it was correctly mentioned in PDF mode.

Thereafter, the Company received an email from Query LODR (copy attached as Annexure-B) requesting us to mention the correct meeting date in the postal ballot XBRL filing i.e. instead of meeting date on 19.07.2024 it should be mentioned 23.08.2024 which was as same as mentioned in the PDF documents already filed by us with BSE. Hence on 30.08.2024 Company once again filed the voting results in XBRL mentioning the meeting date as 23.08.2024. (Copy of XBRL acknowledgement of 30.08.2024 attached as Annexure -C). Therefore, the allegation of non-submission of voting results within time permitted under Regulation 44(3) of SEBI (LODR) Regulations, 2015 is absolutely incorrect and out of place.



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Certificate No. INAAACS7249C2F228

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In view of above, you will observe that there was no non-submission/non-compliance on the part of the Company as the voting results were filed well within the permitted timeline when the e-voting ended on 23/08/2024 hence imposing of fine/penalty on the Company is baseless and irrelevant.

In view of all above facts and circumstances, we hereby request BSE to withdraw/waive the said file of Rs. 11800/- since there is no case of non-submission as the Company filed the e-voting results well within the timeline permitted under Regulation 44 (3) of SEBI (LODR) Regulations which kindly be withdrawn at the earliest and oblige.

The correspondence was received from BSE after working hours on Friday, September 13, 2024. It is to be noted that the subsequent two days were designated as non-working days. On Monday i.e. Today, this response is being filed.

The details as required under Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023 is annexed herewith as "Annexure – 1".

Thanking you,

Yours faithfully,

FOR SUPREME PETROCHEM LTD

D.N. MISHRA

COMPANY SECRETARY



Annexure-1

Name of Authority	BSE Limited
Nature and details of the action(s) taken, initiated or order(s) passed	Fine of Rs. 11,800/- imposed on Company due to allegedly non-submission of postal ballot voting results within the prescribed period (viz., 2 working days from the closure of e-voting event) as provided under Regulation 44(3) SEBI (LODR) Regulations, 2015, as corroborated by the documents attached herewith which is absolutely incorrect and baseless as the Company filed voting result on the same day when e-voting for its Postal Ballot ended viz 23.08.2024 in terms of Regulation 44(3) of SEBI(LODR) Regulations, 2015. Hence, the Company did not commit any non-compliance as alleged by BSE albeit a typo error in date of the meeting in XBRL format as stated hereinabove, However, the correct date of the meeting was mentioned in the pdf format filed simultaneously with BSE regarding same event which does not amount to non-submission of voting results as alleged by BSE.
Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority	BSE Limited dated 13.09.2024.
Details of the violation(s)/ contravention(s) committed or alleged to be committed	Non-compliance of Regulation 44(3) of SEBI (LODR) Regulations, 2015 to non-submission of voting results within the period provided under Regulation 44(3) SEBI (LODR), Regulation, 2015 which is utterly incorrect and baseless as cited above and the Company has initiated due process for withdrawal of aforesaid fine imposed by BSE.
Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible	NIL except to the extent of penalty amount mentioned above, if not waived which is also being challenged before BSE for withdrawal of said fine.



Annexure-A

BSE LTD ACKNOWLEDGEMENT

Acknowledgement No

2308202408461544

Date & Time: 23/08/2024 08:46:15 PM

Scrip Code

500405

Entity Name

SUPREME PETROCHEM LIMITED

Compliance Type

Regulation 44 -Voting Results

Quarter / Period

19/07/2024

Mode

: XBRL E-Filing



Date & Time of Download : 16/09/2024 15:20:07

BSE ACKNOWLEDGEMENT

Acknowledgement Number	7794441
Date and Time of Submission	8/23/2024 8:14:15 PM
Scripcode and Company Name	500405 - SUPREME PETROCHEM LTD.
Subject / Compliance Regulation	Shareholder Meeting / Postal Ballot-Outcome of Postal_Ballot
Submitted By	JEAN BHANDARY
Designation	Designated Officer for Filing

Disclaimer: - Contents of filings has not been verified at the time of submission.



Annexure-A

Date & Time of Download : 16/09/2024 15:21:30

BSE ACKNOWLEDGEMENT

Acknowledgement Number	7794429
Date and Time of Submission	8/23/2024 8:12:30 PM
Scripcode and Company Name	500405 - SUPREME PETROCHEM LTD.
Subject / Compliance Regulation	Shareholder Meeting / Postal Ballot-Scrutinizer"s Report
Submitted By	JEAN BHANDARY
Designation	Designated Officer for Filing

Disclaimer: - Contents of filings has not been verified at the time of submission.



crepancies in Voting Result for Event Date 19 July, 2024

Query lodr <query.lodr@bseindia.com> Fri 30-Aug-24 1:33 PM To:Finian P. Lopez <finian_lopez@spl.co.in> To.

The Compliance Officer/ Company Secretary Supreme Petrochem Ltd (500405)

Dear Sir / Madam,

Sub: Discrepancies in Voting Result for Event Date 19 July, 2024

This is with reference to the Voting Results submitted to the Exchange in XBRL / PDF mode under Reg. 44 of SEBI (LODR) Regulations, 2015.

In this regard, kindly note that the Exchange has observed the following discrepancies:

<u> Discrepancy</u>

Mismatch of XBRL Data with PDF file - Date of the Postal Ballot Meeting (In XBRL mentioned as 19/07/2024 & In PDF mentioned as 23/08/2024)

You are hereby requested to rectify the aforesaid discrepancies immediately and upload the revised voting result in XBRL through BSE online Listing Centre at http://listing.bseindia.com under XBRL tab.

Submissions in PDF mode may be submitted through the Corporate Announcement section of Listing Centre at http://listing.bseindia.com

For issues related to XBRL submission, you may contact Toll-free Helpline Number 9316749660 or mail to xbrl.helpdesk@microvistatech.com along with the screen shot of error and excel utility file.

Thanks & Regards

Listing Compliance Monitoring Team 3SE Limited, MUMBAI 022-22728248

World's Fastest Exchange With A Speed Of 6 Microseconds



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Annexure -C

BSE LTD ACKNOWLEDGEMENT

Acknowledgement No

3008202404201244

Date & Time: 30/08/2024 04:20:12 PM

Scrip Code

500405

Entity Name

SUPREME PETROCHEM LIMITED

Compliance Type

Regulation 44 -Voting Results

Quarter / Period

23/08/2024

Mode

XBRL E-Filing

