

POLYTEX INDIA LIMITED

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Email: polytexindia@gmail.com, CIN: L51900MH1987PLC042092

Date: 24.08.2021

To,
Department of Corporate Services
BSE Limited,
14th Floor, P.J. Towers, Dalal Street,
Fort, Mumbai: 400 001, Maharashtra

Scrip Code: 512481 / Scrip ID: POLYTEX

Subject: Secretarial Compliance Report of the Company for the year ended 31st March, 2021 as required under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Respected Sir,

We are enclosing herewith the Secretarial Compliance Report of the Company for the year ended 31st March, 2021 as required under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as provided by M/s. P. S. Ghundiya & Associates, Practicing Company Secretaries, Pune.

Kindly take the note of the above

Thanking You,
Yours faithfully,

For POLYTEX INDIA LIMITED

Amkariya

.....
ARVIND MULJI KARIYA
Designation: Wholetime Director
DIN: 00216112





Secretarial compliance report of POLYTEX INDIA LIMITED for the year ended March 31st, 2021

I have examined:

- a) all the documents and records made available to us and explanation provided by Polytex India Limited ("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 31st, 2021 ("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 during the review period]*
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; *[to the extent applicable]*
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; *[Not applicable during the review period]*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *[Not applicable during the review period]*
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *[Not applicable during the review period]*
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *[Not applicable during the review period]*

- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Registrar to issue and share transfer agents) Regulations, 1993, as amended;
- (j) The Securities and Exchange Board of India (Intermediaries) Regulations, 2008; *[Not applicable during the review period]*
- (k) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 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
01	Regulation 46 of SEBI (LODR) Regulations 2015	The Company has not hosted information required compliances on website of the company	As explained by the management they are in a process to update the same
02	Regulation 06 of SEBI (LODR) Regulations 2015	The Company has not appointed Company Secretary till March 31, 2021	As explained by the management they have appointed company secretary with effect from 13 th August, 2021
03	Regulation 30 and 31 of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	The company is not filed disclosure under regulation 30 and 31.	As explained by the management they are in a process to file the same
04	Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	The Company has not submitted of Reconciliation of Share Capital Audit Report for the quarter ended September 2020	As explained by the management due to unavoidable circumstance this compliance was not done till 31 st March, 2021 however, it is complied as on date of signing of this report
05	Regulation 40 (9), (10) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has not submitted certificate under Reg.40 (9), (10) of SEBI (LODR) Regulations 2015 for Half Year ended	As explained by the management due to unavoidable circumstance this compliance was not done

		September 2020.	till 31 st March, 2021 however, it is complied as on date of signing of this report
06	Regulation 23(9) of SEBI (LODR) Regulations 2015	The Company has not submitted disclosure under Reg.23 (9) of SEBI (LODR) Regulations 2015 for Half Year ended September 2020	As explained by the management due to unavoidable circumstance this compliance was not done till 31 st March, 2021 however, it is complied as on date of signing of this report
07	Regulation 7 (3) of SEBI (LODR) Regulations 2015	The Company has not submitted compliance certificate under Reg.7 (3) of SEBI (LODR) Regulations 2015 for Half Year ended September 2020	As explained by the management due to unavoidable circumstance this compliance was not done till 31 st March, 2021 however, it is complied as on date of signing of this report
08	Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018	The Company has not submitted compliance certificate under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018 for the quarter ended 30th September, 2020	As explained by the management due to unavoidable circumstance this compliance was not done till 31 st March, 2021 however, it is complied as on date of signing of this report
09	Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	The Company has not submitted The Reconciliation of Share Capital Audit Report for the quarter ended December 2020	As explained by the management due to unavoidable circumstance this compliance was not done till 31 st March, 2021 however, it is complied as on date of signing of this report.
10	Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018	The Company has not submitted compliance certificate under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018 for the quarter ended 31 st December, 2020	As explained by the management due to unavoidable circumstance this compliance was not done till 31 st March, 2021 however, it is complied as on date of signing of this report.

11	Regulation 13 of SEBI (LODR) Regulations 2015	The company has not submitted the statement on share holder complaints under Regulation 13 of SEBI (LODR) Regulations 2015 for quarter ended December 2020	As explained by the management due to unavoidable circumstance this compliance was not done till 31 st March, 2021 however, it is complied as on date of signing of this report.
12	Regulation 27 of SEBI (LODR) Regulations 2015	The company has not submitted the Corporate Report under Regulation 27 of SEBI (LODR) Regulations 2015 for quarter ended December 2020	As explained by the management due to unavoidable circumstance this compliance was not done till 31 st March, 2021 however, it is complied as on date of signing of this report.
13	Regulation 33 of SEBI (LODR) Regulations 2015	The company has not submitted the Financial Results under Regulation 33 of SEBI (LODR) Regulations 2015 for quarter ended December 2020	As explained by the management due to unavoidable circumstance this compliance was not done till 31 st March, 2021 however, it is complied as on date of signing of this report.
14	Regulation 31 of SEBI (LODR) Regulations 2015	The company has not submitted the Share holding Pattern under Regulation 31 of SEBI (LODR) Regulations 2015 for quarter ended December 2020	As explained by the management due to unavoidable circumstance this compliance was not done till 31 st March, 2021 however, it is complied as on date of signing of this report.
15	Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018	The Company has not submitted compliance certificate under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018 for the quarter ended 31st March, 2021	As explained by the management due to unavoidable circumstance this compliance was not done within prescribed period. However, it is complied as on date of signing of this report.
16	Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	The Company has not submitted of Reconciliation of Share Capital Audit Report for	As explained by the management due to unavoidable circumstance this

		the quarter ended March 2021	compliance was not done within prescribed period. However, it is complied as on date of signing of this report.
17	Regulation 7 (3) of SEBI (LODR) Regulations 2015	The Company has not submitted compliance certificate under Reg.7 (3) of SEBI (LODR) Regulations 2015 for Half Year ended March 2021	As explained by the management due to unavoidable circumstance this compliance was not done within prescribed period. However, it is complied as on date of signing of this report.
18	Regulation 40 (9), (10) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has not submitted certificate under Reg.40 (9), (10) of SEBI (LODR) Regulations 2015 for Half Year ended March 2021	As explained by the management due to unavoidable circumstance this compliance was not done within prescribed period. However, it is complied as on date of signing of this report
19	Regulation 13 of SEBI (LODR) Regulations 2015	The company has not submitted the statement on share holder complaints under Regulation 13 of SEBI (LODR) Regulations 2015 for quarter ended March 2021	As explained by the management due to unavoidable circumstance this compliance was not done within prescribed period. However, it is complied as on date of signing of this report
20	Regulation 31 of SEBI (LODR) Regulations 2015	The company has not submitted the Share holding Pattern under Regulation 31 of SEBI (LODR) Regulations 2015 for quarter ended March 2021	As explained by the management due to unavoidable circumstance this compliance was not done within prescribed period. However, it is complied as on date of signing of this report
21	Regulation 23(9)of SEBI (LODR) Regulations 2015	The Company has not submitted disclosure under Reg.23 (9) of SEBI (LODR) Regulations 2015 for Half Year ended March 2021	As explained by the management due to unavoidable circumstance this compliance was not done within prescribed period. However, it is complied as on date of

			signing of this report
22	Regulation 27 of SEBI (LODR) Regulations 2015	The company has not submitted the Corporate Report under Regulation 27 of SEBI (LODR) Regulations 2015 for quarter ended March 2021	As explained by the management due to unavoidable circumstance this compliance was not done within prescribed period. However, it is complied as on date of signing of this report
23	As per SEBI Circular (SEBI/HO/DDHS/CIR/P/2018/144) dated November 26, 2018	The company has not submitted the Large Corporate disclosure and Annual Disclosure as per SEBI Circular as on 31 st March 2021	As explained by the management due to unavoidable circumstance this compliance was not done within prescribed period. However, it is complied as on date of signing of this report
24	BSE Circular Reference no. LIST/COMP/01/2019-20, dated April 02, 2019	The company has not submitted the Trading window intimation as on Quarter ended March, 2021	As explained by the management due to unavoidable circumstance this compliance was not done within prescribed period. However, it is complied as on date of signing of this report

(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:

Sr. No	Action Taken by	Details of Violations	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations / remarks of the Practicing Company Secretary, if any.
1	BSE vide mail dated	Non submission of Reconciliation of Share Capital Audit Report for	Reminder mail received from BSE	The Company has done

	02 nd November, 2020	the quarter ended September 2020		required compliance
2	BSE vide mail dated 20 th November, 2020	Non compliance of Regulation 6 and 7 of SEBI (LODR) Regulations 2015	The BSE has imposed the fine amount Rs.1,08,560/- for non compliance of Regulation 6 (1) and Rs.1,08,560/- for non compliance of Regulation 7 (1) of SEBI (LODR) Regulations 2015	The Company is in process to reply on this mail
3	BSE vide mail dated 07 th December, 2020	Reminder for freezing of promoter demat account for Non-compliance/non payment of fines for Regulation 6(1)/ 7(1)/76 for September 2020	Reminder for freezing of promoter demat account for Non-compliance/non payment of fines for Regulation 6(1)/ 7(1)/76 for September 2020	The Company is in process to reply on this mail.
4	BSE vide mail dated 09 th December, 2020	Non Submission of Certificate under Reg.40(9), (10) of SEBI (LODR) Regulations 2015 for Half Year ended September 2020	Reminder for Non Submission of Certificate under Reg. 40(9), (10) of SEBI (LODR) Regulations 2015 for Half Year ended September 2020. Polytex India Ltd	The Company has filed required certificate under Regulation 40
5	BSE vide mail dated 18 th January, 2021	Fines for non compliance of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for September 2020	The BSE has imposed the fine amount Rs. 2,06,500/- for non compliance of Regulation 23 (9) of SEBI (LODR) Regulations 2015	The Company is in process to reply on this mail.
6	BSE vide mail dated 05 th February, 2021	Reminder for freezing of promoter demat account for Regulation 23(9) for September 2020	The BSE has sent reminder and imposed fine amount Rs.3,00,900/- (calculated till 4 th Feb. 2021).	The Company is in process to reply on this mail. The Compliance has done.
7	BSE vide mail dated 08 th February, 2021	Non submission of Reconciliation of Share Capital Audit Report for the quarter ended December 2020-Reminder	Reminder mail received from BSE for Non submission of Reconciliation of Share Capital Audit Report for the quarter ended December 2020	The Company done required compliance
8	BSE vide mail dated 15 th February,	Fines for non compliance of Regulation 13(3), 27(2), 31, 17(1), 18(1), of 19(1)/19(2) of SEBI (LODR) Regulations 2015 for	The BSE has imposed the fine amount Rs.13,51,100/- collectively for non	The Company has done required compliance.

	2021	quarter ended December, 2020	compliance of Regulation 13(3), 27(2), 31, 17(1), 18(1), of 19(1)/19(2) of SEBI (LODR) Regulations 2015 for quarter ended December, 2020	Further, the Company is in process to reply on this mail
9	BSE vide mail dated 22 nd February, 2021	Fines/action for non compliance of – Reg. 6(1)/Reg. 7(1)/ Reg. 76-December 2020	The BSE has imposed the fine amount Rs.2,17,120/- collectively for non compliance of Regulation 6(1) and 7(1) of SEBI (LODR) Regulations 2015 and Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018 for quarter ended December, 2020	The Company has done required compliance. Further, the Company is in process to reply on this mail
10	BSE vide mail dated 05 th March, 2021	Reminder for freezing of promoter demat account (action under SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020)	The BSE has sent reminder for freezing of promoter demat account, transfer to Z group (Trade for Trade), suspension of trading in the securities of the company which do not comply to pay fine amount Rs.14,56,120/- (collectively) for non compliance of Reg. 13, 27, 31, 17,18,19,20 of SEBI (LODR) Regulations 2015	The Company has done required compliance and the Company is in process to reply on this mail.
11	BSE vide mail dated 15 th March, 2021	Fines imposed for non compliance of Regulation 33 of SEBI (LODR) Regulations 2015	The BSE has imposed the fine amount Rs.1,65,200/- for non compliance of Regulation 33 of SEBI (LODR) Regulations 2015 for quarter ended December, 2020	The Company has done required compliance and the Company is in process to reply on this mail.
12	BSE vide mail dated 23 rd March, 2021	Exchange notice no. 20210323-50 for Shifting of scrips to 'Z' / 'ZP' / 'ZY' group	The BSE has issued notice no. 20210323-50 dated March 23, 2021 issued for Shifting of scrips to 'Z' / 'ZP' / 'ZY' group	The Company has done required compliance.

			due to non-compliances for two consecutive quarters i.e. September 2020 & December 2020 for the Regulation 76 of SEBI (Depositories & Participants) Regulations, 2018	
13	BSE vide mail dated 31st March, 2021	Reminder for freezing of promoter demat account	The BSE has sent reminder for freezing of promoter demat account, transfer to Z group (Trade for Trade), suspension of trading in the securities of the company which do not comply to pay fine amount Rs. 2,59,600/- for non compliance of Reg. 33 SEBI (LODR) Regulations 2015	The Company has done required compliance.
14	BSE vide mail dated 22nd April, 2021	Exchange notice no. 20210422-39 dated April 22, 2021	Exchange notice no. 20210422-39 dated April 22, 2021 for suspension of company on account of non-compliance with Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018 for two consecutive quarters i.e. September 2020 & December 2020	The Company has done required compliance.
15	BSE vide mail dated 17th May, 2021	Fines for non compliance of Regulation 13(3), 27(2), 31, 17(1), 18(1), of 19(1)/19(2), 20(2)/20(2A) of SEBI (LODR) Regulations 2015	The BSE has imposed the fine amount Rs.13,16,880/- collectively for non compliance of Regulation 13(3), 27(2), 31, 17(1), 18(1), of 19(1)/19(2), 20(2)/20(2A) of SEBI (LODR) Regulations 2015 for quarter ended December, 2020	The Company done required compliance and the Company is in process to reply on this mail.
16	BSE vide mail dated 17th May, 2021	Non Submission of Certificate under Reg.40(9), (10) of SEBI (LODR) Regulations 2015 for Half Year ended March 2021	Reminder for Non Submission of Certificate under Reg. 40(9), (10) of SEBI (LODR) Regulations 2015 for Half Year ended March 2020. Polytex	The Company has filed required certificate under Regulation 40.

			India Ltd	
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(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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(e) Due to COVID - 19, we are unable to verify the information physically; therefore we rely on the information as provided by the Company in electronic mode.

For P. S. Ghundiyal & Associates



CS PRATIK GHUNDIYAL
M. No. A50903
C.P No. 19927



UDIN: A050903C000820540

Date: 23.08.2021

Place: Pune