



JINDAL COTEX LIMITED

Regd. Off. : Village Mandiala Kalan, P.O. Bija, Tehsil Khanna, Distt. Ludhiana (PB) 141412
+91 1628 289842 CIN : L17115PB1998PLC021084
info@sigroup.in www.jindalcotex.com

Dated: 25-07-2023

To

The Listing Department,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400001

The Listing Department,
National Stock Exchange of India Ltd.,
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (E)
Mumbai - 400 051

Sub: Submission of Annual Secretarial Compliance Report for the financial year ended 31.03.2023

Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 issued by Securities Exchange Board of India, please find enclosed Annual Secretarial Compliance Report for the financial year ended 31.03.2023, issued by M/s Reecha Goel & Associates, Practicing Company Secretaries.

Kindly find the said statement in order and take on record.

Thanking you,

Yours faithfully,
For Jindal Cotex Limited,

Sandeep Jindal
Managing Director

REECHA GOEL & ASSOCIATES
Company Secretaries
Opposite Sachdeva Autos,
Civil Lines, Phillaur
Mobile: 09814809461

Secretarial Compliance Report of Jindal Cotex Limited for the year ended 31st March, 2023

To,
The Board of Directors,
Jindal Cotex Limited,
Village, Mandiala Kalan,
P.O. Bija, Tehsil Khanna
Distt. Ludhiana.

We, Reecha Goel & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Jindal Cotex 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 31st March, 2023 ("Review Period") in respect of compliance with the provisions of:

- (a) The SEBI Act, 1992 and the Regulations, circulars guidelines issued thereunder; and
- (b) The Securities Contracts (Regulation) Act, 1956, rules made thereunder and the regulations, circulars, guidelines issued thereunder by the SEBI.

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The specific Regulations, whose provisions and the circulars/guidelines issued thereunder, have been examined, include: -

- (a) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - (b) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;
 - (c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - (d) SEBI (Buyback of Securities) Regulations, 2018; (Not applicable for the review period);
 - (e) SEBI (Share-Based Employee Benefits) Regulations, 2014; (Not applicable for the review period);
 - (f) SEBI (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable for the review period);
 - (g) SEBI (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable for the review period);
 - (h) SEBI (Prohibition of Insider Trading) Regulations, 2015;
 - (i) SEBI (Registrars to an issue and Share Transfer Agents) Regulations, 1993;
- and circulars/guidelines issued thereunder; and based on the above examination, we hereby report that during the Review Period:

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And based on the above examination, we hereby report that, during the Review Period compliance status of the listed entity is appended below;

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<p><u>Secretarial Standards:</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p>	YES	
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI 	YES	
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website. • Timely dissemination of the documents/ information under aseparate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to therelevant document(s)/ section of the website 	NO	Few weblinks are not correct



4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	YES	
5.	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	YES	
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI (LODR) Regulations, 2015	YES	
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	YES	
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions. (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit	YES	



	committee.		
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	YES	
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	NO	UPSI not recorded
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/ its promoters/ directors/subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	NO	<u>Details are provided in secretarial audit report annexed as annexure 1</u>
12.	<u>Additional Non-compliances, if any:</u> Not any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NO	



(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)	Regulation/ Circular No.	Deviations	Action taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Regulation 14 of SEBI (LODR), Regulations, 2015	Regulation 14 of SEBI (LODR), Regulations, 2015	The Company has not paid Annual Listing fees.	BSE & NSE	Suspension in the trading of securities	The Company has not paid Annual Listing fees.	--	The listed entity was required to pay annual listing fees for the FY. 22-23 by 30.04.2022. The Company had not paid listing fee to BSE and NSE.	The Company is in the process of filing the application of revocation of suspension in the trading of securities of the Company.	--
2.	Regulation 34 of SEBI(LODR), Regulations, 2015	Regulation 34 of SEBI (LODR), Regulations, 2015	Delay in filing of Annual report for the period 2021-2022 at BSE and NSE	--	--	The Company was required to submit the annual report for the fy. 21-22 not later than the date of commencement of dispatch to its Shareholders. However, the Company submitted the same on 19.11.2022 and 06.12.2022 at BSE and NSE respectively.	--	The listed entity was required to submit its annual report for the fy. 21-22, not later than the date of commencement of dispatch to its Shareholders. However, the Company submitted the same on 19.11.2022 and 06.12.2022 at BSE and NSE respectively.	The Company is in the process of making good all the lapses of the past and assures timely compliance in future.	--



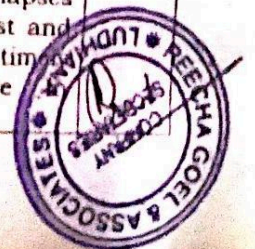
3.	Regulation 33(3)(a)/(d) of SEBI (LODR), Regulations, 2015	Regulation 33(3)(a)/(d) of SEBI (LODR), Regulations, 2015	Delay in submission of Financial results for the quarter end 31.03.2022, 30.06.2022, 30.09.2022 & 31.12.2022 at BSE and NSE	--	--	The listed entity was required to submit the financial result within 45 days from the end of the quarter/60 days from the end of the last quarter by 30.05.2022, 14.08.2022, 14.11.2022 & 14.02.2023 However, the Company submitted the financial results for the quarter ended 31.03.2022 on 09.01.2023, for the quarter ended 30.06.2022 submitted on 06.01.2023 & 07.01.2023 at NSE and BSE respectively, for the quarter ended 30.09.2022 submitted on 20.02.2023 and for the quarter ended 31.12.2022 the financial results submitted on 22.02.2023 at both BSE and NSE.	--	The listed entity was required to submit the financial result within 45 days from the end of the quarter/60 days from the end of the last quarter by 30.05.2022, 14.08.2022, 14.11.2022 & 14.02.2023 However, the Company submitted the financial results for the quarter ended 31.03.2022 on 09.01.2023, for the quarter ended 30.06.2022 submitted on 06.01.2023 & 07.01.2023 at NSE and BSE respectively, for the quarter ended 30.09.2022 submitted on 20.02.2023 and for the quarter ended 31.12.2022 the financial results submitted on 22.02.2023 at both BSE and NSE.	The Company is in the process of making good all the lapses of the past and assures timely compliance in future.	--
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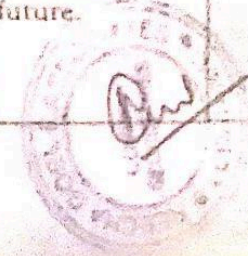
4.	Regulation 24A of SEBI (LODR), Regulations, 2015	Regulation 24A of SEBI (LODR), Regulations, 2015	Delay in submission of Secretarial Report for the period ended 31.03.2022 at BSE and NSE	--	--	The listed entity was required to submit Annual Secretarial Compliance Report within 60 days from the end of the financial year i.e. 30.05.2022. However, the Company submitted the same on 13.01.2023 and 20.01.2023 at BSE and NSE respectively.	--	The listed entity was required to submit Annual Secretarial Compliance Report within 60 days from the end of the financial year i.e. 30.05.2022. However, the Company submitted the same on 13.01.2023 and 20.01.2023 at BSE and NSE respectively.	The Company is in the process of making good all the lapses of the past and assures timely compliance in future.	--
5.	Regulation 13(3) of SEBI (LODR), Regulations, 2015	Regulation 13(3) of SEBI (LODR), Regulations, 2015	Delay in filing of Statement of Investor complaints for the quarter ended 31.03.2022 & 30.06.2022 at BSE and NSE	NSE	Fine imposed for the quarter ended 31.03.2022	The listed entity was required to submit its investor grievance report within 21 days from the end of the quarter by 21.04.2022 & 21.07.2022. However, the Company submitted its report for the quarter ended 31.03.2022 on 18.08.2022 and for the quarter ended 30.06.2022 submitted its report on 28.07.2022 & 18.08.2022 at BSE and NSE respectively.	22000	The listed entity was required to submit its investor grievance report within 21 days from the end of the quarter by 21.04.2022 & 21.07.2022. However, the Company submitted its report for the quarter ended 31.03.2022 on 18.08.2022 and for the quarter ended 30.06.2022 submitted its report on 28.07.2022 & 18.08.2022 at BSE and NSE respectively.	The Company is in the process of making good all the lapses of the past and assures timely compliance in future.	--
6.	Regulation 27(2)(a) of SEBI (LODR), Regulations, 2015	Regulation 27(2)(a) of SEBI (LODR), Regulations, 2015	Delay in filing of Corporate Governance Report for the quarter	--	Fine imposed for the non-compliance of quarter	The listed entity was required to submit its Corporate Governance Report within 21 days from the end of the	50000	The listed entity was required to submit its Corporate Governance Report within 21 days from the end of the	The Company is in the process of making good all the lapses of the past and assures timely	--



			ended 31.03.2022 & 30.06.2022 at BSE and NSE		ended 31.03.2022	quarter 21.04.2022 & 21.07.2022. However, the Company submitted its report for the both quarters ended 31.03.2022 & 30.06.2022 on 21.10.2022 at both BSE and NSE.		quarter 21.04.2022 & 21.07.2022. However, the Company submitted its report for the both quarters ended 31.03.2022 & 30.06.2022 on 21.10.2022 at both BSE and NSE.	compliance in future.	
7.	Regulation 31(1)(b) of SEBI(LODR), Regulations, 2015	Regulation 31(1)(b) of SEBI (LODR), Regulations, 2015	Delay in filing of Shareholding Pattern for the quarter ended 31.03.2022, 30.06.2022, & 30.09.2022 at BSE and NSE	NSE	Fine imposed for the non-compliance of quarter ended 31.03.2022	The listed entity was required to submit its Shareholding Pattern within 21 days from the end of the quarter by 21.04.2022, 21.07.2022 & 21.10.2022. However, the Company submitted its report for the quarter ended 31.03.2022 & 30.06.2022 on 23.08.2022 and for the quarter ended 30.09.2022 on 25.10.2022 at both BSE and NSE.	44000	The listed entity was required to submit its Shareholding Pattern within 21 days from the end of the quarter by 21.04.2022, 21.07.2022 & 21.10.2022. However, the Company submitted its report for the quarter ended 31.03.2022 & 30.06.2022 on 23.08.2022 and for the quarter ended 30.09.2022 on 25.10.2022 at both BSE and NSE.	The Company is in the process of making good all the lapses of the past and assures timely compliance in future.	--
8.	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	Delay in filing of Reconciliation of share audit report for the quarter ended	--	--	The listed entity was required to submit its reconciliation of share audit report within 30 days from the end of the quarter by 30.04.2022 &	--	The listed entity was required to submit its reconciliation of share audit report within 30 days from the end of the quarter by 30.04.2022 &	The Company is in the process of making good all the lapses of the past and assures timely compliance in future.	--



			31.03.2022 & 30.06.2022 at BSE and NSE			30.07.2022. However, the Company submitted its report for the quarter ended 31.03.2022 on 01.09.2022 at BSE and NSE respectively and for the quarter ended 30.06.2022 submitted its report on 05.08.2022 at NSE.		30.07.2022. However, the Company submitted its report for the quarter ended 31.03.2022 on 01.09.2022 at BSE and NSE respectively and for the quarter ended 30.06.2022 submitted its report on 05.08.2022 at NSE.	
9.	Regulation 23(9) of SEBI (LODR), Regulations, 2015	Regulation 23(9) of SEBI (LODR), Regulations, 2015	Delay in filing of Related party disclosure for the half year ended 31 st March, 2022 at BSE & NSE	--	--	The listed entity was required to submit half-yearly related party disclosure within 15 days from the date of publication of its standalone and consolidated financial results. But the same was submitted on 15.09.2022 at both BSE and NSE.	--	The listed entity was required to submit half-yearly related party disclosure within 15 days from the date of publication of its standalone and consolidated financial results. But the same was submitted on 15.09.2022 at both BSE and NSE.	The Company is in the process of making good all the lapses of the past and assures timely compliance in future.
10.	Regulation 7(3) of SEBI (LODR), Regulations, 2015	Regulation 7(3) of SEBI (LODR), Regulations, 2015	Delay in filing of Compliance certificate for the year financial year ended 31 st March, 2022 at BSE & NSE	--	--	The listed entity was required to submit within 30 days from the end of the financial year. However, the Company submitted the same on 24.08.2022 at both BSE and NSE.	--	The listed entity was required to submit within 30 days from the end of the financial year. However, the Company submitted the same on 24.08.2022 at both BSE and NSE.	The Company is in the process of making good all the lapses of the past and assures timely compliance in future.



11.	Regulation 40 (10) of SEBI (LODR), Regulations, 2015	Regulation 40 (10) of SEBI (LODR), Regulations, 2015	Delay in filing of Compliance certificate for the year financial year ended 31 st March, 2022 at BSE & NSE	--	--	The listed entity was required to submit Within 30 days from the end of the financial year. However, the Company submitted the same on 29.08.2022 at both BSE and NSE.	--	The listed entity was required to submit Within 30 days from the end of the financial year. However, the Company submitted the same on 29.08.2022 at both BSE and NSE.	The Company is in the process of making good all the lapses of the past and assures timely compliance in future.	--
12.	Regulation 46 of SEBI (LODR) Regulations, 2015	Regulation 46 of SEBI (LODR) Regulations, 2015	Non-compliance of submission of information required under Regulation 46 of SEBI (LODR) Regulations 2015 on BSE	--	--	The listed entity was required to submit information required as per Regulation 46 of Listing Regulations through BSE Listing Centre by March 15, 2023. However, the Company submitted the same on 12.05.2023.	--	The listed entity was required to submit information required as per Regulation 46 of Listing Regulations through BSE Listing Centre by March 15, 2023. However, the Company submitted the same on 12.05.2023.	The Company assures the timely compliance in future.	--
13.	Regulation 31(4) of SEBI (SAST) Regulations, 2011	Regulation 31(4) of SEBI (SAST) Regulations, 2011	Non-compliance of submission of Declaration under Regulation 31(4) of SEBI (SAST) Regulations, 2011 from the	--	--	The Listed entity was required to submit the declaration from promoters within seven working days from the end of the financial year ended 31.03.2022 and 31.03.2023. However, the Company submitted the declaration for fy. 31.03.2022 on	--	The Listed entity was required to submit the declaration from promoters within seven working days from the end of the financial year ended 31.03.2022 and 31.03.2023. However, the Company submitted the declaration for	The Company assures the timely compliance in future.	--



			Promoter on BSE and NSE for the financial years ended 31.03.2022 & 31.03.2023			13.06.2023 and for the fy. ended 31.03.2023 submitted the declaration on 11.05.2023.		fy. 31.03.2022 on 13.06.2023 and for the fy. ended 31.03.2023 submitted the declaration on 11.05.2023.	
14.	Regulation 3(5) and 3(6) of SEBI (Prohibition of Insider Trading) Regulation, 2015 (PIT Regulation)	Regulation 3(5) and 3(6) of SEBI (Prohibition of Insider Trading) Regulation, 2015 (PIT Regulation)	UPSI not recorded	-	-	UPSI not recorded	-	UPSI not recorded	The Company assures the timely compliance in future.
15.	Regulation 17(1)(c) of SEBI (LODR) Regulations, 2015	Regulation 17(1)(c) of SEBI (LODR) Regulations, 2015	Requirement of minimum six directors	-	--	The Company is required to have the Board of atleast six directors as the Company is covered under top 2000 listed entities on the basis of market capitalization data for the financial year ended 31.03.2022 on NSE.	--	The Company is required to have the Board of atleast six directors as the Company is covered under top 2000 listed entities on the basis of market capitalization data for the financial year ended 31.03.2022 on NSE.	The management is making sincere and intense efforts to appoint two independent directors and shall be able to appoint them shortly.
16.	Regulation 6(1) of SEBI(LODR), Regulations, 2015	Regulation 6(1) of SEBI(LODR), Regulations, 2015	The Company has not complied with the requirement of appointment of qualified Company Secretary as compliance officer of the	--	--	The listed entity was required to comply with the requirement of appointment of qualified Company Secretary as compliance officer of the Company.	--	The listed entity was required to comply with the requirement of appointment of qualified Company Secretary as compliance officer of the Company. But Company was not able to appoint the same ever since the resignation of previous	The Company is looking for a suitable candidate to fill the vacancy of Company Secretary despite sincere efforts no suitable candidate was



			Company.				Company secretary on 14.06.2019.	available for appointment.	
17.	The Securities Contracts (Regulation) Act, 1956	Chapter V of Delisting Regulations, Section 21A of Securities Contracts (Regulation) Act, 1956 ("SCRA") read with Rule 21 of Securities Contracts (Regulation) Rules, 1957 ("SCRR")	Company being suspended for more than six months i.e. from 12.03.2020 on account of non-compliance with the listing requirement s. Further, NSE circular dated October 22, 2021 w.e.f. November 22, 2021 notified.	BSE & NSE	Suspension in the trading of securities	The trading in the securities suspended on account of non-compliance with listing agreement and non-payment of Annual listing fees of several years	--	BSE vide its email dated 13.10.2020 had advised the Company for payment of Annual Listing fee failing which the Company may face compulsory delisting in terms of chapter V of Delisting Regulations. As per the circular the Company is allowed to trade in the securities only on the first trading day of every week till the Company complies and make the payment of the outstanding Annual listing fees to Exchange.	The Company is in the process of filing the application of revocation of suspension in the trading of securities of Company.

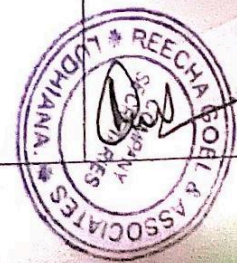
(b) The listed entity has taken the following actions to comply with the observations made in previous reports:



Sr. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations made in the secretarial compliance report for the year ended 31.03.2022	Management Response	Remarks
1.	Regulation 14 of SEBI(LODR), Regulations, 2015	Regulation 14 of SEBI(LODR), Regulations, 2015	The Company had not paid Annual listing fees to BSE and NSE	BSE & NSE	Suspension in trading of securities	The Company had not paid Annual listing fees to BSE and NSE.	--	The Company has not paid Annual Listing fees for the past few years to BSE and NSE.	The Company is in the process of filing the application of revocation of suspension in the trading of securities of the Company.	The company has still not paid the annual listing fee.
2.	Regulation 34 of SEBI(LODR), Regulations, 2015	Regulation 34 of SEBI(LODR), Regulations, 2015	The Company has delayed in filing of Annual report for the period 2020-21, with BSE and NSE	BSE & NSE	Fine	The Company has delayed in filing of Annual report for the period 2020-21, with BSE and NSE	Rs. 256000/- and Rs. 264000 imposed by BSE and NSE respectively	The Company has delayed in filing of Annual report for the period 2020-21, with BSE and NSE.	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the penalty in this regard



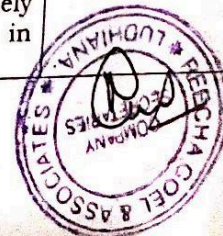
3.	Regulation 13(3) of SEBI(LODR), Regulations, 2015	of Regulation 13(3) of SEBI(LODR), Regulations, 2015	Delay in filing Statement of Investor complaints for the quarter ended 30 th September, 2021	BSE & NSE	Fine	Delay in filing Statement of Investor complaints for the quarter ended 30 th September, 2021	Rs. 58000/-	Delay in filing Statement of Investor complaints for the quarter ended 30 th September, 2021	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.
4.	Regulation 13(3) of SEBI(LODR), Regulations, 2015	of Regulation 13(3) of SEBI(LODR), Regulations, 2015	Delay in filing of Statement of Investor complaints for the quarter ended 31 st March, 2022	NSE	Fine	Delay in filing of Statement of Investor complaints for the quarter ended 31 st March, 2022	Rs.22000/-	Delay in filing of Statement of Investor complaints for the quarter ended 31 st March, 2022	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.



5.	Regulation 27(2) (a) of SEBI (LODR), Regulations, 2015	Regulation 27(2) (a) of SEBI (LODR), Regulations, 2015	Delay in filing of corporate governance report for the quarter ended 30 th September, 2021	BSE & NSE	Fine	Delay in filing of corporate governance report for the quarter ended 30 th September, 2021	Rs. 116000/-	Delay in filing of corporate governance report for the quarter ended 30 th September, 2021	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.
6.	Regulation 27(2) (a) of SEBI (LODR), Regulations, 2015	Regulation 27(2) (a) of SEBI (LODR), Regulations, 2015	Delay in filing of corporate governance report for the quarter ended 31 st December, 2021	BSE & NSE	Fine	Delay in filing of corporate governance report for the quarter ended 31 st December, 2021	Rs. 224000/- and Rs. 220000 was imposed by BSE and NSE respectively	Delay in filing of corporate governance report for the quarter ended 31 st December, 2021	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.



7	Regulation 27(2) (a) of SEBI (LODR) Regulations, 2015	Regulation 27(2) (a) of SEBI (LODR) Regulations, 2015	Delay in filing of corporate governance report for the quarter ended 31 st March, 2022	NSE	Fine	Delay in filing of corporate governance report for the quarter ended 31 st March, 2022	Rs. 50,000/-	Delay in filing of corporate governance report for the quarter ended 31 st March, 2022	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.
8	Regulation 31 of SEBI(LODR), Regulations, 2015	Regulation 31 of SEBI(LODR), Regulations, 2015	Delay in filing of Shareholding Pattern for the quarter ended 30 th September, 2021.	BSE & NSE	Fine	Delay in filing of Shareholding Pattern for the quarter ended 30 th September, 2021.	Rs. 408000/-	Delay in filing of Shareholding Pattern for the quarter ended 30 th September, 2021.	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.



9.	Regulation 31 of SEBI (LODR), Regulations, 2015	Regulation 31 of SEBI (LODR), Regulations, 2015	Delay in filing of Shareholding Pattern for the quarter ended 31 st December, 2021.	BSE & NSE	Fine	Delay in filing of Shareholding Pattern for the quarter ended 31 st December, 2021.	Rs. 220000/-	Delay in filing of Shareholding Pattern for the quarter ended 31 st December, 2021.	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.
10.	Regulation 31 of SEBI (LODR), Regulations, 2015	Regulation 31 of SEBI (LODR), Regulations, 2015	Delay in filing of Shareholding Pattern for the quarter ended 31 st March, 2022.	NSE	Fine	Delay in filing of Shareholding Pattern for the quarter ended 31 st March, 2022.	Rs. 44,000/-	Delay in filing of Shareholding Pattern for the quarter ended 31 st March, 2022.	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.



11.	Regulation 6(1) of SEBI(LODR), Regulations, 2015	Regulation 6(1) of SEBI(LODR), Regulations, 2015	The Company has not complied with the requirement of appointment of qualified Company Secretary as compliance officer of the Company.	BSE & NSE	Fine	The Company has not complied with the requirement of appointment of qualified Company Secretary as compliance officer of the Company for the fy. ended 31.03.2022.	Rs. 365000/-	The Company has not complied with the requirement of appointment of qualified Company Secretary as compliance officer of the Company.	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.
12.	Regulation 23(9) of SEBI (LODR), Regulations, 2015	Regulation 23(9) of SEBI (LODR), Regulations, 2015	Delay in filing of Related party disclosure for the half year ended 31 st March, 2021	BSE & NSE	Fine	Delay in filing of Related party disclosure for the half year ended 31 st March, 2021	Rs. 680000/- and Rs. 2165000/- by BSE and NSE respectively	Delay in filing of Related party disclosure for the half year ended 31 st March, 2021	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.



13.	Regulation 23(9) of SEBI (LODR), Regulations, 2015	Regulation 23(9) of SEBI (LODR), Regulations, 2015	Delay in filing of Related party disclosure for the half year ended 30 th September, 2021	BSE & NSE	Fine	Delay in filing of Related party disclosure for the half year ended 30 th September, 2021	Rs. 15000/- and Rs. 85000/- imposed by BSE and NSE respectively.	Delay in filing of Related party disclosure for the half year ended 30 th September, 2021	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.
14.	Regulation 23(9) of SEBI (LODR), Regulations, 2015	Regulation 23(9) of SEBI (LODR), Regulations, 2015	Delay in filing of Related party disclosure for the half year ended 31 st March, 2022	--	--	Delay in filing of Related party disclosure for the half year ended 31 st March, 2022	--	Delay in filing of Related party disclosure for the half year ended 31 st March, 2022	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The listed entity was required to submit half-yearly related party disclosure within 15 days from the date of publication of its standalone and consolidated financial results. The Company submitted the Related party disclosure on 15.09.2022.



15.	Regulation 33(3)(a) of SEBI (LODR), Regulations, 2015	Regulation 33(3)(a) of SEBI (LODR), Regulations, 2015	Delay in submission of financial results for the quarter end 31 st March, 2021	BSE & NSE	Fine	Delay in submission of financial results for the quarter end 31 st March, 2021	Rs. 155000/- and Rs. 5000/- by BSE and NSE respectively	Delay in submission of financial results for the quarter end 31 st March, 2021	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.
16.	Regulation 33(3)(a) of SEBI (LODR), Regulations, 2015	Regulation 33(3)(a) of SEBI (LODR), Regulations, 2015	Non-compliance of filing of financial results for the quarter end 31 st March, 2022	--	--	Non-compliance of filing of financial results for the quarter end 31 st March, 2022	--	Non-compliance of filing of financial results for the quarter end 31 st March, 2022	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely	The listed entity was required to submit the results within 60 days from the end of the last quarter. The Company submitted the financial results on 09.01.2023.



									compliance in future.	
17.	Regulation 29(2) of SEBI (LODR), Regulations, 2015	Regulation 29(2) of SEBI (LODR), Regulations, 2015	Delay in filing of prior intimation of board meeting dated 14.02.2022	BSE & NSE	Fine	Delay in filing of prior intimation of board meeting dated 14.02.2022	Rs. 10000/-	Delay in filing of prior intimation of board meeting dated 14.02.2022	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The Company has not yet paid the Penalty in this regard.
18.	Regulation 7(3) of SEBI (LODR), Regulations, 2015	Regulation 7(3) of SEBI (LODR), Regulations, 2015	Delay in filing of Compliance certificate for the year financial year ended 31 st March, 2022	--	--	Delay in filing of Compliance certificate for the year financial year ended 31 st March, 2022	--	Delay in filing of Compliance certificate for the year financial year ended 31 st March, 2022	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure	The listed entity was required to submit within 30 days from the end of the financial year. The Company submitted the compliance certificate on 24.08.2022.



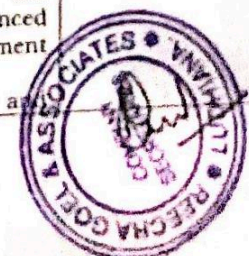
									the timely compliance in future.	
19.	Regulation 40 (10) of SEBI (LODR), Regulations, 2015	Regulation 40 (10) of SEBI (LODR), Regulations, 2015	Delay in filing of Compliance certificate for the year financial year ended 31 st March, 2022	--	--	Delay in filing of Compliance certificate for the year financial year ended 31 st March, 2022	--	Delay in filing of Compliance certificate for the year financial year ended 31 st March, 2022	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The listed entity was required to submit Within 30 days from the end of the financial year. The Company submitted the compliance certificate on 29.08.2022.
20.	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	Delay in filing of reconciliation of share audit report for the quarter ended 30 th September, 2021	--	--	Delay in filing of reconciliation of share audit report for the quarter ended 30 th September, 2021	--	Delay in filing of reconciliation of share audit report for the quarter ended 30 th September, 2021	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure	The listed entity was required to submit its reconciliation of share audit report for the quarter ended 30.09.2021 by 30.10.2021. The Company submitted its report on 01.09.2022.



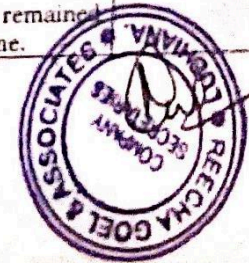
									the timely compliance in future.	
21.	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	Delay in filing of reconciliation of share audit report for the quarter ended 31 st December, 2021	--	--	Delay in filing of reconciliation of share audit report for the quarter ended 31 st December, 2021	--	Delay in filing of reconciliation of share audit report for the quarter ended 31 st December, 2021	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The listed entity was required to submit its reconciliation of share audit report for the quarter ended 31.12.2021 by 30.01.2022. The Company submitted its report on 01.09.2022.
22.	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	Delay in filing of reconciliation of share audit report for the quarter ended 31 st March, 2022	--	--	Delay in filing of reconciliation of share audit report for the quarter ended 31 st March, 2022	--	Delay in filing of reconciliation of share audit report for the quarter ended 31 st March, 2022	It was for the reasons beyond the control of the Company that during the last few years there were some lapses happened. Now, the Company is in the process of making good all the lapses and ensure the timely compliance in future.	The listed entity was required to submit its reconciliation of share audit report for the quarter ended 31.03.2022 by 30.04.2022. The Company submitted its report on 01.09.2022.



23.	SEBI Act, and SCRA, 1956	SEBI Act, and SCRA, 1956	Violation of Section 12A (a), (b), (c) of SEBI Act, 1992 read with Regulations 3(a), (b), (c), (d) and 4(1), 4(2)(f), (k), (r) of PFUTP Regulations	SEBI	Penalties	Violation of Section 12A (a), (b), (c) of SEBI Act, 1992 read with Regulations 3(a), (b), (c), (d) and 4(1), 4(2)(f), (k), (r) of PFUTP Regulations	Penalty of Rs. 10,00,00,000 /- (Rupees Ten Crore Only) imposed under penal provisions of Section 15HA of the SEBI Act, 1992.	Violation of Section 12A (a), (b), (c) of SEBI Act, 1992 read with Regulations 3(a), (b), (c), (d) and 4(1), 4(2)(f), (k), (r) of PFUTP Regulations Penalty of Rs. 10,00,00,000 (Rupees Ten Crore Only) imposed under penal provisions of Section 15HA of the SEBI Act, 1992.	The Company filed an appeal before the Hon'ble Securities Appellate Tribunal ("SAT") against the SEBI order dated 23.01.2020. The SAT pronounced the judgement dated 23.02.2023 and reduced the penalty against the Company to Rs. 25 lakh and Rs. 10 lakh against Mr. Sandeep Jindal. But the penalty on Mr. Rajinder Jindal and Mr. Yash Paul Jindal remained the same.	The Company has paid the reduced penalty.
			Violation of Section 21 of SCRA, 1956 read with Clauses 36(7) of Listing Agreement (3 instances)	SEBI	Penalties	Violation of Section 21 of SCRA, 1956 read with Clauses 36(7) of Listing Agreement (3 instances)	Penalty of Rs. 15,00,000/- (Rupees Fifteen Lakh Only) imposed under penal provisions of Section 23E of the SCRA, 1956	Violation of Section 21 of SCRA, 1956 read with Clauses 36(7) of Listing Agreement (3 instances) Penalty of Rs. 15,00,000/- (Rupees Fifteen Lakh Only) imposed	The Company filed an appeal before the Hon'ble Securities Appellate Tribunal ("SAT") against the SEBI order dated 23.01.2020. The SAT pronounced the judgement dated 23.02.2023 and	The Company has paid the penalty in this regard.



								under penal provisions of Section 23E of the SCRA, 1956	reduced the penalty against the Company to Rs. 25 lakh and Rs. 10 lakh against Mr. Sandeep Jindal. But the penalty on Mr. Rajinder Jindal and Mr. Yash Paul Jindal remained the same.	
								Violation of Section 21 of SCRA, 1956 read with Clauses 32 and 50 of Listing Agreement (1 instance)		
								Violation of Section 21 of SCRA, 1956 read with Clauses 32 and 50 of Listing Agreement (1 instance)		
								Violation of Section 21 of SCRA, 1956 read with Clauses 32 and 50 of Listing Agreement (1 instance)	The Company filed an appeal before the Hon'ble Securities Appellate Tribunal ("SAT") against the SEBI order dated 23.01.2020. The SAT pronounced the judgement dated 23.02.2023 and reduced the penalty against the Company to Rs. 25 lakh and Rs. 10 lakh against Mr. Sandeep Jindal. But the penalty on Mr. Rajinder Jindal and Mr. Yash Paul Jindal remained the same.	The Company has paid the penalty in this regard.



				Violation of Section 21 of SCRA, 1956 read with Clause 50 of Listing Agreement (2 instances)	SEBI	Penalties	Violation of Section 21 of SCRA, 1956 read with Clause 50 of Listing Agreement (2 instances)	Penalty of Rs. 15,00,000/- (Rupees Fifteen Lakh Only) imposed under penal provisions of Section 23E of the SCRA, 1956	Violation of Section 21 of SCRA, 1956 read with Clause 50 of Listing Agreement (2 instances) Penalty of Rs. 15,00,000/- (Rupees Fifteen Lakh Only) imposed under penal provisions of Section 23E of the SCRA, 1956	The Company filed an appeal before the Hon'ble Securities Appellate Tribunal ("SAT") against the SEBI order dated 23.01.2020. The SAT pronounced the judgement dated 23.02.2023 and reduced the penalty against the Company to Rs. 25 lakh and Rs. 10 lakh against Mr. Sandeep Jindal. But the penalty on Mr. Rajinder Jindal and Mr. Yash Paul Jindal remained the same.	The Company has paid the penalty in this regard.
24	SEBI Act, 1992	SEBI Act, 1992	Violation of Section 19 read with sections 11(1), 11(4), and 11 B of the Securities and Exchange Board of India Act, 1992.	SEBI	SEBI order	Violation of Section 19 read with sections 11(1), 11(4), and 11 B of the Securities and Exchange Board of India Act, 1992.	The Company and its promoter directors viz. Sh. Sandeep Jindal, Sh. Yash Paul Jindal and Sh. Rajinder Jindal have been restrained from accessing the securities market	Violation of Section 19 read with sections 11(1), 11(4), and 11 B of the Securities and Exchange Board of India Act, 1992. The Company and its promoter directors viz. Sh. Sandeep Jindal, Sh.		The Company's and all other notices' demat accounts remain frozen	



							directly or indirectly and further prohibited from any kind of buying selling or otherwise dealing in securities market including units of mutual funds for a period of five years from order dated 24.08.2019	Yash Paul Jindal and Sh. Rajinder Jindal have been restrained from accessing the securities market directly or indirectly and further prohibited from any kind of buying selling or otherwise dealing in securities market including units of mutual funds for a period of five years from order dated 24.08.2019	
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In terms of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 SEBI had inter alia required the listed entity to amend the terms of appointment of its statutory auditors in terms of clauses 6(A) and 6(B) of the said circular. In this regard I report that the re-appointment of statutory auditors of the listed entity during review period includes the conditions mentioned in clauses 6(A) and 6(B) of the said circular.

For Reecha Goel & Associates

Company Secretary

(Reecha Gupta)

Prop.

FCS : 6562

C P No.: 7012

Place: Phillaur

Date: 09.06.2023

UDIN: F006562E000472379

