



**P I T H A M P U R
P O L Y P R O D U C T S
L I M I T E D**

Regd. Office & Works : Plot No. 115,
Sector - III, Industrial Area,
Pithampur - Dist. Dhar (M.P.)
Ph.: 0091-07292-403234, 407875,
Email : info@ppplonline.com
Website : www.ppplonline.com
CIN : L25202MP1994PLC008513

Date: 26/04/2025

To,

**Bombay Stock Exchange Limited,
P.J. Towers, Dalal Street,
Kala Ghoda, Fort,
Mumbai -400001 (MH)**

Subject: Annual Secretarial Compliance Report for the year ended 31st March 2025.

Script Code: 530683

Dear Sir,

In compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, We are submitting the Annual Secretarial Compliance Report for the year ended March 31, 2025.

This is for your information and records.

Thanking you.

Yours Faithfully
For **Pithampur Poly Product Limited**

**Managing Director
(R.K. Tekriwal)
DIN 00011492**

Encl : a/a



RAKHI DASGUPTA & ASSOCIATES

COMPANY SECRETARIES IN PRACTICE
UCN-S2019WB692200; FCS13485; CP No.: 20354
csrakhidasgupta@gmail.com; contact: +91-62910-50996;
Address: Paschim Daspara, Nischintapur Road, Sonarpur,
Kolkata- 700150

Date: 20/04/2025

Ref. No.: RDA/FCS/PR/004/2025-2026

Secretarial compliance report of PITHAMPUR POLY PRODUCTS LIMITED for the year ended
31ST MARCH 2025

I/We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by PITHAMPUR POLY PRODUCTS LIMITED (“the listed entity”), having its Registered Office at 115, Industrial Estate, Pithampur Dist. Dhar. Secretarial Review was conducted in a manner that provided me/us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my/our observations thereon.

Based on my/our verification of the listed entity’s books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I/we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March 2025 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I/We Rakhi Dasgupta & Associates, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by,
- (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 2025 (“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;



RAKHI DASGUPTA & ASSOCIATES

COMPANY SECRETARIES IN PRACTICE
UCN-S2019WB692200; FCS13485; CP No.: 20354
csrakhidasgupta@gmail.com; contact: +91-62910-50996;
Address: Paschim Daspara, Nischintapur Road, Sonarpur,
Kolkata- 700150

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

(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;

(e) *Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2021;

(f) *Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2015;

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (other Regulations as applicable) and circulars/ guidelines issued thereunder;

* No event took place under these regulations during the audit period and based on the above examination, I/We hereby report that, during the Review Period:

I.(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.	deviation	Action taken by	Type of action	Details of violation	Fine amount	Observations/ Remarks of the Practicing Company Secretary	Management response	Remarks
1	Company Secretary	Regulation 6	Not appointed	Replied to BSE under SOP of exemption from fine	warning letter issued and fine charged	Company Secretary not appointed		Company was under control of IRP for insolvency procedure. The Company have not yet fully recovered from NCLT. The handover procedure from IRP is still under process. The matter with IRP is still going on at Hon'ble	Replied to BSE under SOP of exemption from fine	



RAKHI DASGUPTA & ASSOCIATES

COMPANY SECRETARIES IN PRACTICE
UCN-S2019WB692200; FCS13485; CP No.: 20354
csrakhidasgupta@gmail.com; contact: +91-62910-50996;
Address: Paschim Daspara, Nischintapur Road, Sonarpur,
Kolkata- 700150

								Supreme Court.		
								As Financial Condition of the Company is very weak due to no business and the Company has no employees. All the works are being done by consultants. In such a situation no candidate will desire to join the company.		
								In spite of this the Management of the Company is under search of the Candidate for position of Company Secretary and in contact with various recruitment agencies		

II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/NO/NA)	Observations/ Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	Yes	<i>complied</i>
2.	Other conditions relating to resignation of statutory auditor		
	Reporting of concerns by Auditor with	NA	NA



RAKHI DASGUPTA & ASSOCIATES

COMPANY SECRETARIES IN PRACTICE
UCN-S2019WB692200; FCS13485; CP No.: 20354
csrakhidasgupta@gmail.com; contact: +91-62910-50996;
Address: Paschim Daspara, Nischintapur Road, Sonarpur,
Kolkata- 700150

	respect to the listed entity/its material subsidiary to the Audit Committee:		
	<p>In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.</p> <p>Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>	NA	NA
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure-A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	NA	NA

*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

III. I/we hereby report that, during the review period the compliance status of the listed entity is appended as below :



RAKHI DASGUPTA & ASSOCIATES

COMPANY SECRETARIES IN PRACTICE
 UCN-S2019WB692200; FCS13485; CP No.: 20354
 csrakhidasgupta@gmail.com; contact: +91-62910-50996;
 Address: Paschim Daspara, Nischintapur Road, Sonarpur,
 Kolkata- 700150

Sr. No.	Particulars	Compliance Status (Yes/NO/NA)	Observations/ Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	YES	COMPLIED
2	Adoption and timely updation of the Policies: <input checked="" type="checkbox"/> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities <input checked="" type="checkbox"/> All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	YES	COMPLIED
3.	Maintenance and disclosures on Website: The Listed entity is maintaining a functional website Timely dissemination of the documents/information under a separate section on the website Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website	YES	COMPLIED
4.	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	YES	COMPLIED
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NA	NA
6.	Preservation of Documents: 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	COMPLIED
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	YES	COMPLIED
8.	Related Party Transactions:	YES	COMPLIED



RAKHI DASGUPTA & ASSOCIATES

COMPANY SECRETARIES IN PRACTICE
UCN-S2019WB692200; FCS13485; CP No.: 20354
csrakhidasgupta@gmail.com; contact: +91-62910-50996;
Address: Paschim Daspara, Nischintapur Road, Sonarpur,
Kolkata- 700150

	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.		
9.	Disclosure of events or information: 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	COMPLIED
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	COMPLIED
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been 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 except as provided under separate paragraph herein (**).	YES	COMPLIED
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	NA

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Kolkata

Date: 20/04/2025

UDIN: F013485G000157411

RAKHI
Signature: DASGUPTA

CS Rakhi Dasgupta, FCS-13485, C.P. NO.: 20354

Peer Review: 5413/2024

Digitally signed by RAKHI
DASGUPTA
Date: 2025.04.20 18:22:54
+05'30'

