



# KSHITIJ Polyline Ltd.

WORLD CLASS PRODUCTS

Regd. Office : 8, Sona Udyog, Parsi Panchayat Road, Andheri (East), Mumbai - 400 069. (INDIA)  
Factory Address : Survey No. 110/1/13-14 & 11-12, Amla Village, 66 K.V.A. Road, Opp. Lane to Silvassa  
Municipal Council, Silvassa,(U.T.) of Dadra and Nagar Haveli and Daman And Diu - 396230  
Tel.: 2838 8562 / 2838 6812 | Email : kshitij123@hotmail.com | Website : www.kshitijpolyline.co.in

CIN : L25209MH2008PLC180484

To  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra-Kurla Complex,  
Bandra (East)  
Mumbai - 400 051.

Date: May 30, 2023

**SYMBOL: KSHITIJPOL**

Dear Sir/Ma'am,

**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2023.**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, from time to time, we are forwarding herewith Annual Secretarial Compliance Report of the Company for the year ended March 31, 2023, issued by Ronak Jhuthawat & Co., Practicing Company Secretaries.

This is for your information and record.

For Kshitij Polyline Limited

BHARAT  
HEMRAJ GALA

Digitally signed by BHARAT HEMRAJ GALA  
DN: cn=, postalCode=400069, st=MAHARASHTRA,  
+1=MUMBAI SURUBANK, o=Personal,  
serialNumber=a642ec5915618653fda5b114c57a3b  
80bac2736d4882c2447075e146eaff,  
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2.5.4.20=a9ed7096d2417b2987cdf5c1ac433e89e3b  
e44880505b1ab573445aa920d7,  
email=BG@KSHITIJPOLYLINE.COM, cn=BHARAT  
HEMRAJ GALA, h#e=1148  
Date: 2023.05.30 18:30:24 +05'30'

**Bharat Hemraj Gala**  
**Managing Director**  
**DIN: 01994342**

**Address: Flat No. 802, 8th Floor, Minal Tower,**  
**Old Nagardas Road, Andheri East,**  
**Mumbai, Maharashtra-400069**



**SECRETARIAL COMPLIANCE REPORT OF  
KSHITIJ POLYLINE LIMITED  
(For the year ended 31.03.2023)**

To,  
The Board of Directors,  
**KSHITIJ POLYLINE LIMITED**  
8, Sona Udyog, Parsi Panchayat Road,  
Andheri East Mumbai

We, M/s Ronak Jhuthawat & Co. have examined:

- A. all the documents and records made available to us and explanation provided by **KSHITIJ POLYLINE LIMITED** (CIN: L25209MH2008PLC180484) ("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 31.03.2023 ("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

(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- **Not applicable during the review period.**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not applicable during the review period.**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not applicable during the review period.**

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(h) Securities and Exchange Board of India (Registrars to an Issue and share transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with Client; **Not applicable during the financial year under review;**



Based on the above examination, I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1	<p><b><u>Secretarial Standards:</u></b></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><b><u>Adoption and timely updation of the Policies:</u></b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>• All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	YES	
3	<p><b><u>Maintenance and disclosures on Website:</u></b></p> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/information under a separate section on the website</li> <li>• 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</li> </ul>	<p>Yes</p> <p>No</p> <p>Yes</p>	<p>Company has not uploaded some policy and documents on website.</p>
4	<p><b><u>Disqualification of Director:</u></b></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	
5	<p><b><u>To examine details related to Subsidiaries of listed entities:</u></b></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	<p>NA</p> <p>NO</p>	<p>Company has no Material Subsidiary</p> <p>Company has incorporated Subsidiary on 16.01.2023.</p>
6	<p><b><u>Preservation of Documents:</u></b></p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations</p>	Yes	



	and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.		
7	<b>Performance Evaluation:</b> 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	<b>Related Party Transactions:</b> (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 committee	Yes  NA	
9	<b>Disclosure of events or information:</b> 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	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> 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	Yes	No action has been taken by SEBI or Stock Exchange.
12	<b>Additional Non-compliances, if any:</b> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	NSE has issued notice dated 22.05.2023 for non-Compliance under Regulation 17(1).  Company has not submitted Annual Secretarial Compliance to NSE.



I further report that -

- The Company has complied with the requirements of Structural Digital Data Base in terms of Securities & Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 including various Circulars issued by SEBI thereunder and Circular(s) issued by BSE Limited dated March 16, 2023.
- There were no instance of resignation of statutory auditor from the listed entity and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.

#### "Annexure-A"

The company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -

Compliance Requirement (Regulations/Circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action taken by	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company)	Management Response

#### "Annexure-B"

The company has taken the following actions to comply with the observations made in previous reports:

Compliance Requirement (Regulations/Circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action taken by	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company)	Management Response
Not Any	N.A.	Not Any	Not Any	Not Any	Not Any	NIL	Not Any	Not Any

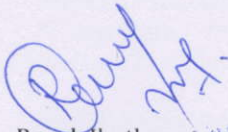
#### Assumptions & Limitation of scope and Review:

- Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
- Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- 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.

For Ronak Jhuthawat & Co.  
(Practicing Company Secretaries)



Ronak Jhuthawat  
Proprietor  
FCS: 9738, CP: 12094  
Peer Review: 1270/2021  
UDIN- F009738E000416971



Place: Udaipur  
Date: 30.05.2023