



**PRAGNYA PRADHAN & ASSOCIATES**  
PRACTICING COMPANY SECRETARIES

**Secretarial compliance report of Jindal Poly Investment And Finance Company**  
**Limited for the year ended 2021-22**

I Pragnya Parimita Pradhan, Company Secretary in whole time practice, have examined:

- (a) all the documents and records made available to us and explanation provided by Jindal Poly Investment And Finance Company 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 31, 2022 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 (Prohibition of Insider Trading) Regulations, 2015;
- (e) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;

and circulars/ guidelines issued thereunder; and based on the above examination, I hereby report that, during the Review Period:

46, LGF, JOR BAGH, New Delhi-110003  
Mob: 9953457413 Email id: Pragnyap.pradhan@gmail.com





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- (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
-----NIL-----			

- (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 violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
-----NIL-----				

- (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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
----- Not Applicable -----				





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I, further report that during the year under review Company has passed the Special resolution through Postal ballot process for Voluntary Delisting of the Equity Shares of the Company from BSE Limited and National Stock Exchange of India. However, the Special Resolution cannot be acted upon under Regulation 11 (4) of the SEBI (Delisting of Equity Shares) Regulations, 2021 since the number of votes cast by the public shareholder in favour of the resolution is less than two times of the votes cast by the public shareholders against the resolution.

Signature:

*Pragnya Parimita Pradhan*

**Name: Pragnya Parimita Pradhan**

**ACS No: A32778**

**CP No: 12030**

**UDIN: A032778D000373349**

**Peer Review No: 1564/2021**



Place: New Delhi

Date: 24-05-2022