



# LAKHOTIA POLYESTERS (INDIA) LIMITED

158/159, Samarth Sahkari Audyogik Vasahat Ltd, Pimpalgaon (Baswant),  
Tal. Niphad, Dist. Nashik, Maharashtra - 422 209, India.  
Telefax: 02550 - 252300; Email: info@lakhotiapoly.in; Website: www.lakhotiapoly.in

Date: May 30, 2019

To,  
The Manager  
BSE Ltd  
P.J. Towers, Dalal Street,  
Mumbai- 400 001

**Subject: - Submission of Annual Secretarial Compliance Report for the financial year ended on March 31, 2019**

Ref Scrip Code:- 535387

Scrip Id:- LAKHOTIA

Dear Sir/Madam,

In Compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, Please find enclosed herewith Annual Secretarial Compliance Report for the financial year ended on March 31, 2019.

This is for your information and records.

For Lakhotia Polyesters (India) Ltd

**LAKHOTIA POLYESTERS (INDIA) LTD.**

**AUTHORISED SIGNATORY / DIRECTOR**

Vivek Rath  
Compliance Officer  
Place:- Nashik

Encl.: As Above

CIN No. :- L17120MH2005PLC155146

To,  
**The Board of Directors**  
**Lakhotia Polyesters (India) Limited**  
**[CIN: L17120MH2005PLC155146]**  
158/159 Samarth Sahkariaudyogik Vasahat Ltd  
Pimpal- Gaon (Baswant) Tal Niphad  
**Dist. Nashik - 422209**

We have been engaged by **Lakhotia Polyesters (India) Limited** (hereinafter referred to as 'the Company') whose equity shares are listed on BSE Limited (Security Code: 535387) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and to issue Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance of the provisions Securities and Exchange Board of India Act, 1992 ("SEBI Act"), the Securities Contracts (Regulation) Act, 1956 ("SCRA"), and all applicable Rules, Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all SEBI Act, SCRA and all applicable Rules, Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Annual Secretarial Compliance Report in the format prescribed is enclosed herewith.

For **R M MIMANI & ASSOCIATES LLP**  
**[Company Secretaries]**  
**[Firm Registration No.: I2001MH250300]**

*Ranjana Mimani*

**Ranjana Mimani**  
**(Partner)**

FCS : 6271  
CP No.: 4234



Place: Mumbai  
Dated: May 29, 2019



**Secretarial Compliance report  
of  
Lakhotia Polyesters (India) Limited for the year ended March 31, 2019  
[Under regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements)  
Regulations, 2015]**

We have examined:

- (a) all the documents and records made available to us and explanation provided by **Lakhotia Polyesters (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 on March 31, 2019 ("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 there-under; and
- b. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there-under and the Regulations, circulars, guidelines issued there-under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there-under, 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 as there was no reportable event during the review period]**
- (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 as there was no reportable event during the review period]**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **[Not applicable as there was no reportable event during the review period]**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **[Not applicable as there was no reportable event 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 as there was no reportable event during the review period]**

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

and circulars/guidelines issued there-under; and based on the above examination, we hereby report that, during the Review Period;

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there-under 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
1	Regulation – 6(1)	Compliance officer is not a qualified Company Secretary	Nil
2	Regulation – 7(3)	Compliance certificate submitted to the Exchange signed by person other than Compliance officer	Nil
3	Regulation - 14	Listing fee payment for the 2017-18 was delayed beyond April 30, 2018	Nil
4.	Regulation 33(3) and para 4 of Schedule III	<ul style="list-style-type: none"> <li>Financial Results for the quarter ended on March 31, 2018 and June 2018 were not submitted within time limit specified</li> </ul>	Outcome of the Board Meetings does not provide for the time at which the Meeting were concluded.
5.	Regulation -31	Shareholding patterns for the quarter ended on June 30, 2018 was not submitted with the time limit specified.	Nil





6	Regulation 44(3)	Voting Results of the AGM held on September 30, 2018 are submitted after 48 hours of conclusion of AGM	Nil
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(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there-under 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 there-under:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter	Observations/ Remarks of the Practicing Company Secretary
1.	BSE Limited	Regulation – 6(1)	fines	Nil

(d) The listed entity has taken the following actions to comply with the observations made in previous reports [**Not applicable, as this is first review period for which report is being issued**]

For **R M MIMANI & ASSOCIATES LLP**  
**[Company Secretaries]**  
**[Firm Registration No.: I2001MH250300]**

*Ranjana Mimani*

**Ranjana Mimani**  
**(Partner)**

FCS : 6271  
CP No.: 4234



Place: Mumbai  
Dated: May 29, 2019