

Shri Jagdamba Polymers Limited

Regd. Office : "HARMONY", 4th Floor, 15/A, Shree Vidhyanagar Co-Op. Hsg. Soc. Ltd., Opp. NABARD,
Nr. Usmanpura Garden, Usmanpura, Ahmedabad - 380014 (INDIA)
Tele. No. +91-79-26565792 , E-mail ID - admin@jagdambapolymers.com & gst@jagdambapolymers.com
CIN - L17239GJ1985PLC007829 & GST No.- 24AACCS1262K1ZH



Date: May 30, 2025

To,

BSE Limited

Corporate Relationships Department

1st Floor, New Trading Ring,

Rotunda Building, Phiroze Jeejeebhoy Towers,

Dalal Street, Mumbai - 400 001

BSE Code: 512453

Dear Sir/ Madam,

Sub: Annual Secretarial Compliance Report for the year ended on March 31, 2025

Ref: Regulation 24A of the SEBI (LODR) Regulations, 2015

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report issued by G R Shah & Associates, Practicing Company Secretaries, for the year ended on March 31, 2025.

Kindly take note of the same.

Thank you

For, Shri Jagdamba Polymers Limited

Dharmistha Kabra
Company Secretary
(ACS 73289)

Enclosures: As above



Secretarial compliance report of Shri Jagdamba Polymers Limited for the year ended 31st March, 2025

I Gaurang R Shah (Company Secretary) have examined:

- a) all the documents and records made available to me and explanation provided by **SHRI JAGDAMBA POLYMERS 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, 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;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable during the audit 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 during the audit period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable during the audit period)**
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable during the audit period)**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



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h) other regulations as applicable

and circulars / guidelines issued thereunder;

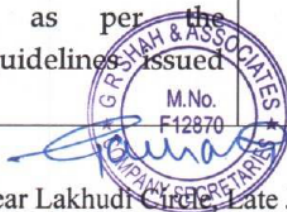
and based on the above examination, I hereby report that, during the Review Period:

(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:- As per the Annexure enclosed.

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

(c) I/we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No	Particulars	Compliance status (Yes/ No/ NA)	Observations/ Remarks by PCS
1.	<u>Secretarial Standard</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	-
2.	<u>Adoption and timely updation of the Policies:</u> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • 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.	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none">• 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 redirects to the relevant document(s)/ section of the website	Yes	-
4.	<u>Disqualification of Director:</u> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	-
5.	<u>To examine details related to Subsidiaries of listed entities:</u> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	Yes	-
6.	<u>Preservation of Documents:</u> <p>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</p>	Yes	-



	prescribed under SEBI LODR Regulations, 2015		
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 committee	Yes	-
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith 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	Yes	-
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u>	Yes	The details of action taken by SEBI or



			Stock Exchange against the company are mentioned below
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	There were no such transactions during the review period.
13.	<u>No additional non-compliances, observed:</u> No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	NA	There were no such transactions during the review period.





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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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: Ahmedabad
Date: 29th May, 2025

FOR, GR SHAH & ASSOCIATES
Company Secretaries



Gaurang Shah
Proprietor
C.O.P. No. 14446
FCS No. 12870
UDIN: F012870G000495506
Peer Review No.: 6653/2025



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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)	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 Secretary	Management Response	Remarks
1	Appointment of Compliance officer and his Obligations	Regulation 6(1)	The company has Non-complied with requirement to appoint a qualified company secretary as the compliance officer	BSE	Fine	As per the company is non-compliant/ not paid fines with the provisions of Regulation 6(1) of SEBI (LODR) Regulations, 2015. As mandated in the SEBI SOP circular the company has	3,540/-	The company has paid the fine levied for non-compliance under Regulation 6(2) of the SEBI (LODR) Regulations, 2015	The Compliance Officer was appointed on January 4, 2024. As per the practice followed by the stock exchange, the penalty for non-	-

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						been intimated about the pending compliance and has also been informed that all the promoters' demat accounts would be frozen if the compliance was not completed and fines not paid.			compliance under Regulation 6(1) was calculated on a quarterly basis and was thereby received after the March 2024 quarter amounting to Rs. 3,000 plus 18% GST for the three-day delay in the said quarter. The said penalty has been duly paid, and the	
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									matter now stands fully complied with.	
2	Non submission of Statement of Impact of Audit Qualifications or Declaration of unmodified audit report in XBRL for the year ended March 31, 2024	SEBI Master Circular No. SEBI/HO /CFD/ PoD2/CI R/P/2023 /120 dated July 11, 2023 (erstwhile SEBI Circular No. CIR/CFD /CMD/ 56/2016 dated May 27, 2016)	The company was required to submit the Statement of Impact of Audit Qualifications or Declaration of unmodified audit report in XBRL for the year ended March 31, 2024 but the financials were submitted with the exchange without Statement of	BSE	Advisory	The Company has not submitted the Statement on Impact of Audit Qualifications or the Declaration of unmodified audit report in the prescribed XBRL format and in the outcome for the Board Meeting of financial results for the financial year ended March 31, 2024	NIL	During the review period, it was observed that the Company has not submitted the Statement on Impact of Audit Qualifications or the Declaration of unmodified audit report in the prescribed XBRL format and in the outcome of the Board Meeting for Financial	The Company received the Stock exchange's advisory on June 5, 2024, to submit the Statement on Impact of Audit Qualifications or Declaration of unmodified audit report (as applicable) in XBRL Mode	

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			Impact of Audit Qualifications or Declaration of unmodified opinion.					Results for the financial year ended March 31, 2024, as mandated under SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (erstwhile SEBI Circular No. CIR/CFD/CMD/56/2016 dated May 27, 2016).	immediately. The Compliance was ensured immediately.	
3	Board Meeting intimation for Declaration of dividend	Regulation 29(1)(e) of SEBI (LODR) Regulations, 2015	The company has not given clear two days intimation for Board meeting in which			Intimation regarding the Board Meeting held on 30 th August, 2024 for the purpose of considering and declaring		It has been observed that the intimation to the Stock Exchange(s) regarding the Board Meeting held on	The delay in providing the requisite intimation was due to	

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			dividend declaration was to be considered.			dividend was submitted to the Stock Exchange(s) on 28 th August, 2024 thereby providing only one clear working days' notice.		for consideration and declaration of dividend was not provided with clear 2 working days' advance notice, excluding the date of the intimation and the date of the meeting, as required under Regulation 29(1) (e) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	inadvertent oversight. The company acknowledges this lapse and sincerely regrets the same. We have reviewed our internal compliance procedures and have initiated corrective measures to strengthen our processes to ensure timely and accurate	
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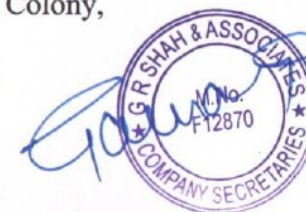
									disclosures in accordance with SEBI regulations going forward.	
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports	Observations made in the Secretarial Compliance report for the year ended March 31, 2025	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / Deviations and actions taken/penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	The Company has paid the fine of Rs. 56,640/- and	The company has made payment of a fine of Rs.	Regulation 6 of Securities and Exchange Board of India (Listing Obligations and Disclosure	Details of violation: The Company has not filled the vacancy caused by the resignation of Company Secretary within three months from the date of such vacancy.	The Company had filled the vacancy by appointing a qualified	The Company has paid the fine of Rs. 56,640/- and appointed the Qualified Company Secretary as

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	appointed the Qualified Company Secretary as Compliance Officer w.e.f 04th January, 2024	56,640/- vide Invoice dated 18/03/2024 and has appointed the qualified company secretary as Compliance officer	Requirements) Regulations, 2015	Type of Action: Fine Fine Amount: Regulation 6(2): Rs. 56,640/-	company secretary as its Compliance officer.	Compliance Officer w.e.f 04th January, 2024
2	The Company delayed the compliance with provisions of Reg. 3(5) and /or Regulation 3(6) of SEBI (Prohibition of Insider	The company clarified that the required software to record and maintain the Unpublished Price	Regulation 3(5) and Regulation 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	Details of violation: The company delayed the compliance with provisions of Reg. 3(5) and /or Regulation 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to Structured Digital Database. Type of Action: Inspection Fine Amount: Nil	The company installed the required software to record and maintain the Unpublished Price Sensitive Information (UPSI) and entries were	The Company took corrective action to comply with the requirements of Regulation 3(5) and 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 by installing the necessary Structured Digital Database

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Trading) Regulations, 2015 relating to Structured Digital Database.	Sensitive Information (UPSI) was installed, the required entries to record the flow of UPSI in and outside the organization were made and a certificate certifying the Compliance with the applicable provision			made recording flow of UPSI in and outside the organization	(SDD) software. The Company has confirmed that the SDD is functional and that entries are being made to record the communication and sharing of Unpublished Price Sensitive Information (UPSI) within and outside the organization.
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		s was obtained from a Practicing Company Secretary and submitted to the Stock Exchange where the shares of the company are listed.				
3	The Company revised the Announcement required to be filed with the Stock Exchange	The Company revised the Corporate Announcement regarding	Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. SEBI/HO/CFD	Details of violation: The Company didn't file the Resignation Letter of Mr. Kunjal Soni, Company Secretary and Compliance Officer of the Company in the Announcement required to be filed under Regulation 30 with the Stock Exchange.	The Company revised the Announcement required to be filed with the Stock Exchange under	The Company subsequently took corrective action by revising the announcement submitted to the Stock Exchange(s) and attached the resignation letter of

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under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and attached in that Resignation Letter of Mr. Kunjal Soni as per the SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023	g Change in Key Managerial Personnel and Compliance Officer-Intimation required to be filed under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and	/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023		Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and attached in that Resignation Letter of Mr. Kunjal Soni as per the SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023	Mr. Kunjal Soni in line with the prescribed disclosure format under the SEBI circular.
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		attached the Resignation Letter of Mr. Kunjal Soni in it.				
4	The promoters of the company not made disclosure under Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 within seven working days from the end of financial	The company has duly made the disclosure under Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 on 13/04/20	Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011	Details of violation: The promoters of the company has not made the disclosure under Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 within seven working days from the end of financial regarding non-encumbrance of shares other than those already disclosed during the financial year.	The company has duly made the disclosure under Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 on 13/04/2024.	The Company filed the said disclosure on 13th April, 2024, thereby regularizing the compliance with a delay.

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regarding non-encumbrance of shares other than those already disclosed during the financial year on 13 th April, 2024.	24 given the mishap in internal compliance timelines				
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