



JINDAL COTEX LIMITED

Regd. Off. : Village Mandiala Kalan, P.O. Bija, Tehsil Khanna, Distt. Ludhiana (PB) 141412
+91 1628 289842 CIN : L17115PB1998PLC021084
info@sjgroup.in www.jindalcotex.com

Dated: 30th June, 2021

To
The Listing Department,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

Listing Department,
National Stock Exchange Limited,
Exchange Plaza,
Bandra Kurla Complex,
Bandra (E),
Mumbai - 400 051

Subject: Annual Secretarial Compliance Report for the year ended 31st March, 2021

Symbol: JINDALCOT

Series: EQ

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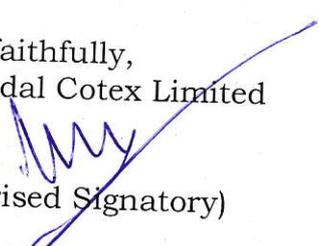
Dear Sir/Madam,

In compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith Annual Secretarial Compliance Report for the financial year ended 31st March, 2021.

Kindly take the same on your record.

Thanking you,

Yours faithfully,
For Jindal Cotex Limited


(Authorised Signatory)

REECHA GOEL & ASSOCIATES

COMPANY SECRETARIES

Opposite Sachdeva Autos

Civil Lines, PHILLAUR

(M): 098148-09461

Secretarial Compliance Report of Jindal Cotex Limited for the year ended 31st March, 2021

To,
The Board of Directors,
Jindal Cotex Limited,
Village, Mandiala Kalan,
P.O. Bija, Tehsil Khanna
Distt. Ludhiana.

We, Reecha Goel & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Jindal Cotex 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, 2021 ("Review Period") in respect of compliance with the provisions of :

- (a) The SEBI Act, 1992 and the Regulations, circulars guidelines issued thereunder; and
- (b) The Securities Contracts (Regulation) Act, 1956, rules made thereunder and the regulations, circulars, guidelines issued thereunder by the SEBI.



The specific Regulations, whose provisions and the circulars/guidelines issued thereunder, have been examined, include:-

- (a) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - (b) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;
 - (c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - (d) SEBI (Buyback of Securities) Regulations, 2018;(Not applicable for the review period);
 - (e) SEBI (Share-Based Employee Benefits) Regulations, 2014;(Not applicable for the review period);
 - (f) SEBI (Issue and Listing of Debt Securities) Regulations, 2008;(Not applicable for the review period);
 - (g) SEBI (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013; (Not applicable for the review period);
 - (h) SEBI (Prohibition of Insider Trading) Regulations, 2015;
 - (i) SEBI (Registrars to an issue and Share Transfer Agents) Regulations, 1993;
- and circulars/guidelines issued thereunder; 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 14 of SEBI (LODR), Regulations, 2015	The company has not paid Annual Listing fees.	The listed entity was required to pay annual listing fees for the FY20-21 by 30.04.2020 which later extended to 30.06.2020 due to covid pandemic situation in the country. The company had paid listing fee in part to BSE and NIL to NSE. Consequently, the company was suspended for trading at both the Stock exchanges i.e. NSE and BSE.
2.	Regulation 34 of SEBI(LODR), Regulations, 2015	Delay in filing of Annual report for the period 2019-20, with BSE and NSE.	The listed entity was required to submit its Annual Report for the FY19-20 not later than the date of commencement of dispatch to its shareholders i.e. 04-12-2020. However, the same was submitted by the company on 12.02.2021.



3.	Regulation 13(3) of SEBI(LODR), Regulations, 2015	Delay in filing Statement of Investor complaints for the quarter ended 30 th June, 2020	The listed entity was required to submit Statement of Investor complaints for the quarter ended 30 th June, 2020 by 21.07.2020. But the same was submitted on 28.07.2020.
4.	Regulation 31 of SEBI (LODR), Regulations, 2015	Delay in filing of Shareholding Pattern for the quarter ended 30 th June, 2020.	The listed entity was required to submit its Shareholding Pattern for the quarter ended 30 th June, 2020 by 21.07.2020. But the same was submitted on 28.07.2020.
5	Regulation 6(1) of SEBI (LODR), Regulations, 2015	The company has not complied with the requirement of appointment of qualified Company Secretary as compliance officer of the company.	The listed entity was required to comply with the requirement of appointment of qualified Company Secretary as compliance officer of the company. But company was not able to appoint the same ever since the resignation of previous company secretary on 14.06.2019.
6	Regulation 23(9) of SEBI (LODR), Regulations, 2015	The company has not filed the said regulation yet for the half year ended 30 th Sept, 2020	The listed entity was required to submit half yearly related party disclosure within 30 days of publication of financial results but the same was not submitted till date.
7.	The Securities Contracts (Regulation) Act, 1956	Company being suspended for more than six months i.e. from 12.03.2020 on account of non compliance with the	BSE vide its email dated 13.10.2020 had advised the company for payment of Annual Listing fee failing which the Company may face



		listing requirements.	compulsory delisting in terms of chapter V of Delisting Regulations.
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(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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.
1.	BSE	Non submission of Annual Report for the year ended 2019-20 under Regulation 34 of SEBI (LODR), Regulations, 2015.	Fine amounting to Rs. 110920/- was imposed upon the company for non compliance of Regulation 34 of SEBI (LODR), Regulations, 2015 by BSE.	The company has not yet paid the fine in this regard.
2.	BSE & NSE	Non-compliance of Statement of Investor complaints for the quarter ended 30 th June, 2020	Fine amounting to Rs. 8260/- was imposed upon the company for non compliance of Regulation 13(3) of SEBI (LODR), Regulations, 2015 by BSE and NSE	The company has not yet paid the fine in this regard.
3.	BSE & NSE	Non compliance of Shareholding Pattern for the quarter ended 30 th June, 2020	Fine amounting to Rs. 16520/- was imposed upon the company for non compliance of Regulation 31 of SEBI (LODR), Regulations, 2015	The company has not yet paid the fine in this regard.



			by BSE and NSE	
4.	BSE & NSE	Non compliance of requirement of appointment of Company Secretary	Fine amounting to Rs. 324500 and Rs. 107380 imposed upon the company for non compliance of Regulation 6(1) of SEBI (LODR), Regulations, 2015 in FY 2020-21 by BSE and NSE respectively.	The company has not yet paid the fine in this regard.
5.	BSE & NSE	Non compliance regarding payment of Annual Listing fees.	Annual Listing Fee for FY 2020-21 amounting to Rs. 295000/- and Rs. 342200/- is liable to be paid to BSE and NSE respectively for non compliance of Regulation 14 of SEBI (LODR), Regulations, 2015	The company has not yet paid the outstanding Annual listing fees of FY 2020-21 and earlier is pending too.

(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 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Regulation 14 of SEBI (LODR),	The company has not paid Annual Listing	The company had partly paid outstanding	The trading in the scrips of the Company have



	Regulations, 2015	fees for the past few years to BSE and NSE.	Annual listing to BSE and Nil to NSE.	been suspended.
2	Regulation 34 of SEBI (LODR), Regulations, 2015	The company has delayed in filing of Annual report for the period 2018-19, with BSE and NSE.	The company not paid the fine	The trading in the scrips of the Company have been suspended.
3.	Regulation 13(3) of SEBI(LODR) Regulations, 2015	Delay in filing Statement of Investor complaints for the quarter ended 31st December, 2019	The company not paid the fine.	Pending
4.	Regulation 31 of SEBI (LODR), Regulations, 2015	Delay in filing of Shareholding Pattern for the quarter ended 31st December, 2019.	The company not paid the fine.	Pending
5.	Regulation 6(1) of SEBI (LODR), Regulations, 2015	The company has not complied with the requirement of appointment of qualified Company Secretary as compliance officer of the company.	The company not paid the fine.	Pending
6.	SEBI Act, 1992 and SCRA, 1956	Violation of Section 12A (a), (b), (c) of SEBI Act, 1992 read with Regulations 3(a), (b), (c), (d)	The company has not paid the Penalty in this regard.	The company has not yet paid the Penalty in this regard.



		and 4(1), 4(2)(f), (k), (r) of PFUTP Regulations Penalty of Rs. 10,00,00,000/- (Rupees Ten Crore Only) imposed under penal provisions of Section 15HA of the SEBI Act, 1992.		
		Violation of Section 21 of SCRA, 1956 read with Clauses 36(7) of Listing Agreement (3 instances) Penalty of Rs. 15,00,000/- (Rupees Fifteen Lakh Only) imposed under penal provisions of Section 23E of the SCRA, 1956	The company has not paid the Penalty in this regard.	The company has not yet paid the Penalty in this regard.



		<p>Violation of Section 21 of SCRA, 1956 read with Clauses 32 and 50 of Listing Agreement (1 instance)</p>	<p>The company has not paid the Penalty in this regard.</p>	<p>The company has not yet paid the Penalty in this regard.</p>
		<p>Violation of Section 21 of SCRA, 1956 read with Clause 50 of Listing Agreement (2 instances) Penalty of Rs. 15,00,000/- (Rupees Fifteen Lakh Only) imposed under penal provisions of Section 23E of the SCRA, 1956</p>		
7.	SEBI Act, 1992	<p>Violation of Section 19 read with sections 11(1), 11(4), and 11 B of the Securities and Exchange Board of India Act, 1992 The company and its promoter directors viz. Sh. Sandeep Jindal, Sh. Yash</p>	<p>The company's and all other noticees' demat accounts were frozen.</p>	<p>The company's and all other noticees' demat accounts remain frozen.</p>



		<p>Paul Jindal and Sh. Rajinder Jindal have been restrained from accessing the securities market directly or indirectly and further prohibited from any kind of buying selling or otherwise dealing in securities market including units of mutual funds for a period of five years from order dated 24.08.2019</p>	
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(e) In terms of SEBI Circular No. CIR/CFD/CMDI/114/2019 dated October 18, 2019 SEBI had inter alia required the listed entity to amend the terms of appointment of its statutory auditors in terms of clauses 6(A) and 6(B) of the said circular. In this regard I report that there was no event of appointment/reappointment/resignation of statutory auditor of the listed entity during the review Period and the terms of appointment of its existing statutory auditor includes the conditions mentioned in clauses 6(A) and 6(B) of the said circular.

The prevailing circumstances in the country on account of Lockdown and COVID-19 have impacted to some extent, verification of documents and records of the company.

For Reecha Goel & Associates

Company Secretaries

(Reecha Gupta)

Propy

FCS : 6562

C P No.: 7012

Place: Phillaur

Date: 30-06-2021

UDIN: F006562C000551480