



# JOLLY KRUTESH PATEL

COMPANY SECRETARIES

(Peer Review Certificate no:3772/2023)

FCS: 10937 CP NO:21010

079-48004971. [jolly@krutesh.ca](mailto:jolly@krutesh.ca)

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SECRETARIAL COMPLIANCE REPORT  
OF DUTRON POLYMERS LIMITED  
FOR THE YEAR ENDED 31ST MARCH, 2026

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**To,**  
**The Board of Directors**  
**Dutron Polymers Limited**  
**Dutron House, Nr. Mithakhal Underbridge,**  
**Navrangpura, Ahmedabad**

I have examined:

- (a) all the documents and records made available to us, and explanation provided by Dutron 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 report, for the financial year ended 31st March 2026 (“Review Period”) in respect of compliance with the provisions of:

- (I) The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the regulations, circulars, guidelines issued thereunder; and
- (II) The Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the regulations, circulars, guidelines issued thereunder by SEBI.

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

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

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**UDIN - F010937H000407850**

**ADD: B-310, GOPAL PALACE B- WING, OPP OCEAN PARK, ABOVE HOTEL MAAN  
RESIDENCY, JHANSI KI RANI BRTS, AHMEDABAD-380015**



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- SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
- SEBI (Prohibition of Insider Trading) Regulations, 2015
- SEBI (Depositories and Participants) Regulations, 2018
- SEBI (Investor Education and Protection Fund) Authority Rules
- SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993

and such other SEBI Regulations as applicable for the review period.

The following SEBI Regulations were not applicable during the review period:

- SEBI (Buy-Back of Securities) Regulations, 2018
- SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018
- SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021
- SEBI (Delisting of Equity Shares) Regulations, 2021
- SEBI (REITs and InvITs) Regulations
- SEBI (Portfolio Managers, Mutual Funds, AIF) Regulations

**(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 (Regulation/ circular)	Regulation No.	Deviations	Action taken by	Type of Action	Details of Violation	Fine Amount	Detailed Observations/Remarks of PCS	Management Response
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	/ guideline)								
1	Filing of Secretarial Compliance Report in XBRL mode	Regulation 24A	Delay in filing of XBRL filing for FY ended 31.03.2025	BSE Limited	Finance Levied	Delay in XBRL filing under Regulation 24A	63720/-	The non-filing in XBRL mode was procedural and unintentional in nature. The Company subsequently completed the filing and paid the penalty levied by BSE Limited.	The Company has complied subsequently, and penalty amount has been paid.
2.	Submission of Voting Results	Regulation 44(3)	Delay in submission of voting results	BSE Limited	Finance Levied	Voting results were not submitted within prescribed	11,800/-	Delay in submission resulted in levy of fine by BSE Limited.	The Company has paid the penalty amount and

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						timeline		The Company subsequently submitted the required details and paid the fine amount.	taken corrective measures to avoid recurrence.
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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 ..... (The years are to be mentioned)	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
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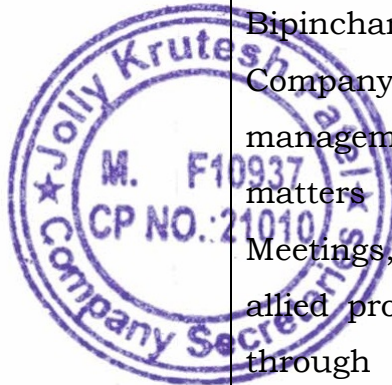
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## (I) Additional Compliance Review Items:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Remarks
1	Compliance with Secretarial Standards	Yes	<p>The Company has generally complied with the applicable Secretarial Standards issued by the Institute of Company Secretaries of India. However, a petition under Sections 241 and 242 of the Companies Act, 2013 has been filed before the Hon'ble National Company Law Tribunal, Ahmedabad Bench by Mr. Sudip Bipinchandra Patel &amp; Others against the Company and others in relation to certain management and governance related matters including conduct of Board Meetings, Annual General Meeting and allied proceedings. The Hon'ble Tribunal, through various interim orders, has directed conduct of meetings, participation of parties and mediation proceedings. The matter is presently sub judice and pending adjudication. Accordingly, no opinion is expressed on the merits of the allegations raised in the said proceedings.</p>





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2	Policy Adoption and Updation	Yes	Policies approved by Board and timely updated.
3	Website Disclosures	Yes	Functional and materially in compliance with Reg. 46. However, the company must ensure that it complies with all requirement.
4	Director Disqualification	Yes	No director disqualified as per MCA records.
5	Subsidiary Disclosures	NA	Not applicable as no material subsidiary exists.
6	Document Preservation	Yes	As per policy under SEBI LODR.
7	Performance Evaluation	Yes	Completed annually. Board and committees reviewed.
8	Related Party Transactions	Yes	Audit Committee approvals taken.
9	Disclosure of Events and Information	Yes	Timely and adequate disclosures made.
10	Insider Trading Regulations	Yes	Trading window policy and code of conduct in place.
11	SEBI/Stock Exchange Actions	Yes	Responded to all notices. Penalties paid, no pending orders. Inquiry made in December to April but no order is received till date.
12	Auditor Resignation	NA	No resignation reported during the period.

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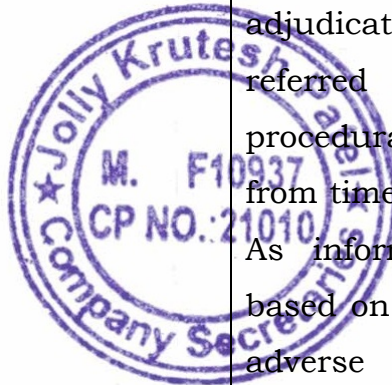
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13	ESOP Transactions	NA	No ESOPs granted/vested/exercised during the year.
14	Additional Non-compliances	No	Except as disclosed elsewhere in this report, no additional material non-compliance under SEBI Regulations was observed during the review period. It is observed that proceedings bearing CP/28(AHM)2024 and connected IA/106(AHM)2025 filed before the Hon'ble National Company Law Tribunal, Ahmedabad Bench by Mr. Sudip Bipinchandra Patel & Others are pending adjudication. The matter has been referred for mediation and interim procedural directions have been issued from time to time by the Hon'ble Tribunal. As informed by the management and based on records made available, no final adverse order impacting the listing compliances of the Company has been passed as on the date of this report.



## Assumptions & Limitations of Scope and Review:

- 1) **Scope of Responsibility:** This Report has been issued solely for compliance under Regulation 24A(2) of SEBI LODR and is not intended as an audit or legal opinion.
- 2) **Accuracy of Records:** We have relied upon the representations and documents provided by the management. Authenticity and correctness of these records are the responsibility of the Company.

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- 3) **Legal Matters:** Certain disputes relating to management and governance matters are presently pending before the Hon'ble National Company Law Tribunal, Ahmedabad Bench in CP/28(AHM)2024 and IA/106(AHM)2025 filed under Sections 241 and 242 of the Companies Act, 2013. Our scope of review in respect of such proceedings is limited to examination of records, filings, disclosures and interim orders made available to us. We have neither independently verified the factual merits of the allegations nor expressed any legal opinion on the outcome of the said proceedings.
- 4) **Financial Verification:** The correctness of financial statements, internal audit reports, or tax positions has not been reviewed.
- 5) **Management's Role:** Ensuring actual compliance with applicable laws is solely the responsibility of the management. Our role is restricted to reporting based on review of relevant papers.

**For Jolly Krutesh Patel  
Company Secretaries**



**Jolly Krutesh Patel**

**FCS: 10937 CP No.: 21010**

**UDIN: F010937H000407850**

**Date: 19th May 2026**

**Place: Ahmedabad**

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