

CIN: L17100GJ1985PLC127398

To,
Listing Compliance Department
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex Bandra East,
Mumbai - 400051.

Dear Sir/Madam,

Subject:

Board Comments on Fine Levied by the Exchange.

Reference:

Notice issued by the NSE having reference number NSE/LIST-SOP/COMB/FINES/0573

Dated May 20, 2025

This is to inform you that the Board of Directors has reviewed letter no. NSE/LIST-SOP/COMB/FINES/0573, dated May 20, 2025, received from the National Stock Exchange of India Limited (NSE), concerning a notice of non-compliance under Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, due to a delay of 90 days. The notice of non-compliance was duly presented to the Board at its meeting on May 30, 2025, during which the members recognized and accepted the fine levied by the NSE. The delay was inadvertent and unintentional.

The Company further wants to submit that our company is situated in a remote area at Survey No. 340/1, Beside Hystuff Steel, At Post Raniya, Taluka Savli, District Vadodara, Gujarat – 391780. Due to the location and a limited pool of qualified professionals in the vicinity, we encountered significant challenges in identifying and appointing a suitable candidate for the position in a timely manner.

Nevertheless, we are pleased to inform you that the Company has successfully appointed Mrs. Kiran Tilwani as the Company Secretary and Compliance Officer, effective April 18, 2025, in compliance with Regulation 6(1) of the SEBI Listing Regulations.

The Board reiterates its commitment to preventing similar oversights and ensuring timely compliance. The Company has already paid the fine imposed by the NSE within the stipulated timeline.

Kindly take this information on record and oblige.

Thanking you

For, Polysil Irrigation Systems Limited

(Formerly known as Polysil Irrigation Systems Private Limited)

VADODAR

Bharatkumar Tulshibhai Patel

CEO & Managing Director

DIN: 07780251

Date: 30-05-2025 Place: Vadodara

Encl: Notice No. NSE/LIST-SOP/COMB/FINES/0573, Dated May 20, 2025 issued by NSE

POLYSIL IRRIGATION SYSTEMS LIMITED

Survey No.: 340/1, At & Post - Raniya, Sakarda-Raniya Road, Ta - Savli, Dist.- Vadodara - 391780, Gujarat, INDIA.





NSE/LIST-SOP/COMB/FINES/0573

May 20, 2025

To, The Company Secretary **Polysil Irrigation Systems Limited** Survey No- 340/1, Beside Hystuff Steel, At Post Raniya, Taluka Savli, Vadodara, Gujarat, Pin-391780

Dear Sir/Madam.

Subject: Notice for non-compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") and/or Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018 ("Depository Regulations")

Your attention is drawn towards SEBI Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 (hereinafter referred to as "Master Circular"), specifying Standard Operating Procedure for imposing fines and suspension of trading in case of non-compliance with the Listing Regulations and/or Depository Regulations. On verification of the Exchange records, it has been observed that your Company has not complied/delayed complied with certain regulations of Listing Regulation(s). The details of non-compliance(s)/delayed compliance(s), total fine payable by your Company and the particulars about manner in which fine should be remitted to the Exchange is enclosed as **Annexure**.

You are requested to inform the Promoters about identified non-compliance/delayed compliance and to ensure compliance with respective regulation(s) and/or make the payment of fines within 15 days from the date of this notice, failing which the Exchange may initiate following actions as per Master Circular:

- 1. Initiate freezing of entire shareholding of the Promoters in the Company as well as in other securities held in the Demat account of the Promoters.
- 2. Trading in securities of your Company shall take place on 'Trade for Trade' basis, in case of consecutive defaults with Regulation 76 of Depository Regulations i.e., Shifting of trading in securities to Z Category as per Master Circular.

You may also file the waiver request. Below are the parameters for filing the application for waiver:

- a) Detailed submission indicating reasons for waiver, considering the extant Policy for Exemption of Fines, and shall indicate whether it intends to seek personal hearing before the concerned Committee.
- b) The Company may further note that *compliance is a prerequisite for applying for waiver*. Thus, waiver application of the non-complied Companies will not be processed without achieving the compliance.
- c) In case the Company is non-complaint under multiple regulations, the Company is advised to file a single application mentioning the details of all the respective regulations and quarters for which the Company intends to apply for waiver, in order to a company intends to apply for waiver, in order to a company intends to apply for waiver, in order to a company intends to apply for waiver, in order to a company intends to apply for waiver, in order to a company intends to a company intends to apply for waiver, in order to a company intends to a company intends to apply for waiver, in order to a company intends to a company intends to a company in the company in the company intends to a company intends to a company in the company in the company intends to a company in the company in the company intends to a company intends to a company in the compan







National Stock Exchange Of India Limited

d) Processing fees for an amount of **Rs.10,000 plus 18% GST** to be paid to the **designated Exchange**, (as segregated between the Exchanges as per the policy for waiver of fines) only if the fine amount is more than Rs. 5,000.

However, before filing an application for waiver of fines, you are requested to refer to the below policies available on the Exchange's website. For ready reference you may refer below links:

i. Policy on exemption of fine: https://archives.nseindia.com/content/equities/Policy for exemption SOP Equity.pdf

ii. Policy on processing of waiver application:

https://nsearchives.nseindia.com/web/sites/default/files/inline-files/Policy_on_processing_of_waiver_application_segregation_of_commonly_listed_entities .pdf

The request for waiver of fine can be submitted to Exchange through NEAPS portal along with documentary evidence on the below link (Please note that waiver applications sent via mail will not be considered):

NEAPS>>Compliance>>Fine Waiver>>Waiver Request

Further, as per Master Circular, your Company is also required to ensure that the said non-compliance which has been identified by the Exchange and subsequent action taken by the Exchange in this regard shall be placed before the Board in the next Board Meeting and comments made by the Board shall be duly informed to the Exchange at the below mentioned path in NEAPS portal along with this letter for dissemination having the announcement text as 'Board comments on fine levied by the Exchange'.

Path: NEAPS > COMPLIANCE > Announcements > Announcements / CA (Subject: Updates)

In case of any clarification, you may contact any of the below mentioned Exchange Officers from Listing Compliance Department:

- Ms. Harshita Chaubal
- Ms. Suman Lahoti
- Ms. Madhu Kadam
- ➤ Ms. Chanchal Daga (Waiver request)
- ➤ Ms. Sweety Mamodia (Waiver request)
- Mr. Abhishek Sawant (Waiver request)

Yours faithfully

For National Stock Exchange of India Limited

Rachna Jha Manager

This Document is Digitally Signed





National Stock Exchange Of India Limited

Annexure

Regulation	Quarter	Fine amount per day (Rs.)	Days of non- compliance	Fine amount (Rs.)
6	31-Mar-2025	1000	90	90000
			Total Fine	90000
			(GST @18%)	16200
			Total	106200*

^{*} In case the Company is non-compliant as on the date of this letter then fine amount will keep on increasing every day till the date of compliance.

Notes:

- If the fine amount is paid before receipt of this letter then inform the Exchange accordingly.
- Please update the payment details on below mentioned path: NEAPS > Payment > SOP Fine Payment.
- The above payment may be made vide RTGS / NEFT / Net Banking favouring 'National Stock Exchange of India Limited'. The bank details towards the payment of fine are as follows:

BENEFICIARY NAME	NATIONAL STOCK EXCHANGE OF INDIA LIMITED
BANK NAME	IDBI BANK LTD
	Please refer Unique Account Code used for making Annual Listing fees to the Exchange
BRANCH	BANDRA KURLA COMPLEX, MUMBAI
RTGS/IFSC CODE	IBKL0001000

• The fine paid as mentioned above will be credited to IPFT as envisaged in the circular.

NSF Sign Date Local

This Document is Digitally Signed

Signer: RACHNA JHA Date: Tue, May 20, 2025 17:19:05 IST Location: NSF