



UNITED POLYFAB GUJARAT LIMITED

(Formerly known as United Polyfab (Unit-II) Pvt. Ltd.)

Survey No. 238/239, Shahwadi, Opp. New Aarvee Denim, Narol-Sarkhej Highway, AHMEDABAD-382405.

Phone : 91-079-25731155, 9925232824 Fax : +91-79-25731144 E-mail : unitedpolyfab@unitedpolyfab.com

info@unitedpolyfab.com • CIN No. : L18109GJ2010PLC062928

Date: 28.05.2026

To,
Listing Compliance Department
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex
Bandra East, Mumbai – 400051
Trading Symbol: UNITEDPOLY

To,
Listing Compliance Department
BSE Limited
Phiroze Jeejeebhoy Tower,
Dalal Street, Mumbai – 400 001
Scrip Code: 544756

Subject: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2026

Dear Sir/Ma'am,

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we hereby submit Annual Secretarial Compliance Report issued by M/s. M.K. Samdani & Co. Practicing Company Secretaries, Ahmedabad for the Financial Year ended on 31st March, 2026.

Thanking You,
Kindly update the same on your records.

For, United Polyfab Gujarat Limited

GAGAN
NIRMALKUMAR
AR MITTAL

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GAGAN NIRMALKUMAR
MITTAL
Date: 2026.05.28
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Gagan Nirmalkumar Mittal
Chairman & Managing Director
DIN: 00593377

Place: Ahmedabad

Encl: As above



ANNUAL SECRETARIAL COMPLIANCE REPORT OF UNITED POLYFAB GUJARAT LIMITED
FOR THE YEAR ENDED ON MARCH 31, 2026

I, **Megha Kamal Samdani**, proprietor of **MK SAMDANI & Co., Company Secretaries**, have conducted the review of the compliance of applicable statutory provisions and adherence to good corporate practices by **UNITED POLYFAB GUJARAT LIMITED (CIN: L18109GJ2010PLC062928)** (hereinafter referred to as “the listed entity”), having its registered office at **Survey No. 238, 239, Shahwadi, Opp. New Aarvee Denim, Narol-Surkhej Highway, Ahmedabad, Gujarat, India, 382405.**

The secretarial review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my observations thereon.

Based on my verification of the listed entity’s books, papers, minutes books, forms and returns filed, and other records maintained by the listed entity, along with the information provided by its officers, agents, and authorized representatives during the conduct of the review, I hereby report that the listed entity has complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter.

I, **Megha Kamal Samdani**, proprietor of **MK SAMDANI & Co., Company Secretaries**, have examined:

1. All documents and records made available to me and explanations provided by the listed entity;
2. Filings/submissions made by the listed entity to the stock exchanges;
3. Website of the listed entity;
4. Any other documents/filings that may be relevant and relied upon for this report.

For the financial year ended **March 31, 2026** (“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;

b) 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: -

- 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;



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- d) SEBI (Buyback of Securities) Regulations, 2018; **(Not Applicable during the review period)**
- e) SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable during the review period)**
- f) SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable during the review period)**
- g) SEBI (Delisting of Shares) Regulations, 2021; **(Not Applicable during the review period)**
- h) SEBI (Prohibition of Insider Trading) Regulations, 2015;
- i) SEBI (Depository and Participants) Regulations, 2018.

and circulars/ guidelines issued thereunder; and based on the above examination, I hereby report that, during the Review Period:

I. Compliance Overview: -

(a) During the review period, the listed entity has **complied** with the provisions of applicable regulations and circulars/guidelines issued thereunder, **except for the following observations:**

Sr. No.	Compliance Requirement (Regulation/Circular/Guideline including specific clause)	Regulation/circular no.	Deviations	Action taken by	Type of action	Details of violation	Amount of fine	Observation/remark of the practicing company secretary	Management Response	Remark
-		NA	NA	NA	NA	NA	NA	NA	NA	NA

(b) The listed entity has taken the following actions to comply with the observations made in previous reports: -

Sr. No.	Compliance Requirement (Regulation/Circular/Guideline including specific clause)	Regulation /circular no.	Deviations	Action taken by	Type of action	Details of violation	Amount of fine	Observation/remark of the practicing company secretary	Management Response	Remark
-	-	-	-	-	-	-	-	-	-	-



(C) We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:-

Sr. No.	Particulars	Compliance status (Yes/No)	Observations/ Remarks by PCS*
1	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	NONE
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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI.	Yes Yes	NONE
3	<u>Maintenance and disclosures on Website:</u> - 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 re-directs to the relevant document(s), maintaining a section of the website.	Yes No Yes	NONE



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4	<u>Disqualification of Director:</u> None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	NONE
5	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes Yes	United green Distilleries Private Limited is the only subsidiary company there is no other material as well as other subsidiaries.
6	<u>Preservation of Documents:</u> 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 prescribed under SEBI LODR Regulations, 2015.	Yes	NONE
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/during the financial year as prescribed in SEBI Regulations.	Yes	NONE
8	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes NA	Refer to point 8(a)
9	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under		



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	Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	NONE
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	NONE
11	<u>Actions taken by SEBI or Exchange(s), if any:</u> No action(s) has been taken against the listed entity/ its promoters/ directors/subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	No	Details of action taken by stock Exchange have been specified in Annexure A
12	<u>Resignation of statutory auditors from listed entity or its material subsidiaries: 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 was no such resignation from statutory auditor
13	<u>Additional Non-compliances, if any:</u>	NA	NA



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 Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.

For, MK SAMDANI & Co.

Company Secretaries

Megha
Kamal
Samdani

Digitally signed by
Megha Kamal
Samdani
Date: 2026.05.28
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Megha Kamal Samdani

Proprietor

ACS: 41630

COP: 21853

PR No.: 3320/2023

UDIN: A041630H000523221

Date: 28/05/2026

Place: Ahmedabad



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Annexure 1

Sr. No.	1
Compliance requirement (Regulations/ circular/guidelines Including specific clause)	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
Regulations/ Circular No.	Under Regulation 29: Prior Intimations
Deviations	Delay in Prior intimation to stock exchange about the meeting of the board of directors in specific matters mentioned in the regulation.
Action Taken by	NSE Limited
Type of Action	SOP Fine
Details of Violation	Delay in prior intimation to stock exchange about the meeting of the Board of Directors.
Fine Amount	Rs. 11800 including GST
Observations/Remarks of the Practicing Company Secretary	NSE Limited, vide its letter dated September 15, 2025 had levied a penalty on Company of Rs. 10.000 1- plus GST for the delay in intimation regarding the Board Meeting. Penalty Amount was paid by Company
Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	For the year ended 31-03-2026
Remedial actions, if any, taken by the listed entity	The management is taking steps to create awareness about the same. When the Board became aware.
Comments of the practicing company secretary on the actions taken by the listed entity.	Fine was duly paid to the NSE.
Management Response	The intimation period has been wrongly considered due to which such omission has been occurred and management will now ensure compliance of regulations within due time.
Remarks	-