

**FORM NO. MGT 9**  
**EXTRACT OF ANNUAL RETURN**  
**As on financial year ended on 31.03.2019**

**Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1) of the Company (Management & Administration) Rules, 2014**

<b>I. REGISTRATION &amp; OTHER DETAILS:</b>		
1	CIN	L17115PB1988PLC008820
2	Registration Date	11.11.1988
3	Name of the Company	Nahar Poly Films Limited.
4	Category/Sub-category of the Company	Company limited by shares / Non-govt. company
5	Address of the Registered office & contact details	376, Industrial Area-A, Ludhiana-141003 Tel: +91-161-2600701 to 705 Fax: +91-161-2222942
6	Whether listed company	Yes
7	Name, Address & contact details of the Registrar & Transfer Agent, if any.	M/s. Alankit Assignment Ltd. 3E/7, Jhandewalan Extension New Delhi-110055 Tel: +(011) 23541234 Fax: +(011) 41540064 E-mail Address: <a href="mailto:rta@alankit.com">rta@alankit.com</a>

<b>II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY</b>			
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(All the business activities contributing 10 % or more of the total turnover of the company shall be stated)

S. No	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
1	Manufacture of other Plastic Products n.e.c	22209	100

<b>III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES</b>					
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S. No	Name and address of the Company	CIN/GLN	Holding/ Subsidiary/ Associate	% of shares held	Applicable Section
1	Nahar Capital & Financial Services Limited. 375, Industrial Area-A, Ludhiana-141003	L45202PB2006PLC029 968	Associate	49.16	2(6)



g) FIIs									
h) Foreign Venture Capital Funds									
i) Others (FII'S)									
<b>Sub-total (B)(1):-</b>	<b>9208</b>	<b>654</b>	<b>9862</b>	<b>0.04</b>	<b>2054</b>	<b>654</b>	<b>2708</b>	<b>0.01</b>	<b>-0.03</b>
<b>2. Non- Institutions</b>									
a) Bodies Corp.									
i) Indian	483112	6367	489479	1.99	489574	5962	495536	2.02	+0.03
ii) Overseas									
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 1 lakh	4014229	1246697	5260926	21.40	3901770	1070110	4971880	20.22	-1.18
ii) Individual shareholders holding nominal share capital in excess of Rs 1lakh	1007258	-	1007258	4.09	1016655	-	1016655	4.13	+0.04
c) NBFC registered with RBI	543	-	543	0.00	543	-	543	0.00	0.00
d) Others (specify)	554268	8310	562578	2.29	835014	8310	843324	3.43	+1.14
Non Resident Indians	147374	8310	155684	0.63	154307	8310	162617	0.66	+0.03
Directors and Relatives	2200	-	2200	0.01	3627	-	3627	0.01	0.00
HUF	-	-	-	0.00	193376	-	193376	0.79	+0.79
IEPF	404694	-	404694	1.65	483704	-	483704	1.97	+0.32
<b>Sub-total (B)(2):-</b>	<b>6059410</b>	<b>1261374</b>	<b>7320784</b>	<b>29.77</b>	<b>6243556</b>	<b>1084382</b>	<b>7327938</b>	<b>29.80</b>	<b>+0.03</b>
<b>Total Public (B)</b>	<b>6068618</b>	<b>1262028</b>	<b>7330646</b>	<b>29.81</b>	<b>6245610</b>	<b>1085036</b>	<b>7330646</b>	<b>29.81</b>	<b>0.00</b>
<b>C. Shares held by Custodian for GDRs &amp; ADRs</b>									
<b>Grand Total (A+B+C)</b>	<b>23325963</b>	<b>1262028</b>	<b>24587991</b>	<b>100.00</b>	<b>23502955</b>	<b>1085036</b>	<b>24587991</b>	<b>100.00</b>	<b>0.00</b>

**(ii) Shareholding of Promoter**

SN	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No. of Shares	% of total Shares of the company	% of Shares Pledged/ encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	
1	Kamal Oswal	31500	0.13	NIL	31500	0.13	NIL	NIL
2	Dinesh Oswal	105273	0.43	NIL	105273	0.43	NIL	NIL
3	Abhilash Growth Fund (P) Limited	178025	0.72	NIL	178025	0.72	NIL	NIL
4	Nahar Spinning Mills Ltd.	1253603	5.10	NIL	1253603	5.10	NIL	NIL
5	Atam Vallabh Financiers Ltd	81985	0.33	NIL	81985	0.33	NIL	NIL
6	Kovalam Investment & Trading Co. Ltd.	213037	0.87	NIL	213037	0.87	NIL	NIL
7	Monica Growth Fund (P) Ltd	112560	0.46	NIL	112560	0.46	NIL	NIL
8	Nagdevi Trading & Investment Co Ltd	716080	2.91	NIL	716080	2.91	NIL	NIL
9	Nahar Growth Fund (P) Ltd	46933	0.19	NIL	46933	0.19	NIL	NIL
10	Neha Credit And Investment (P) Ltd	27389	0.11	NIL	27389	0.11	NIL	NIL
11	Ruchika Growth Fund (P) Ltd	112560	0.46	NIL	112560	0.46	NIL	NIL
12	*Shankheshwar Holding Co. Ltd	280784	1.14	NIL	630471	2.56	NIL	NIL
13	Vanaik Investors Ltd	90669	0.37	NIL	90669	0.37	NIL	NIL
14	*Vardhman Investments Ltd	73220	0.30	NIL	988253	4.02	NIL	NIL
15	Vanaik Spinning Mills Ltd	107156	0.44	NIL	107156	0.44	NIL	NIL
16	*Nahar Industrial Enterprises Ltd	1264720	5.14	NIL	0	0.00	NIL	NIL
17	Oswal Woolen Mills Ltd.	153617	0.62	NIL	153617	0.62	NIL	NIL
18	J L Growth Fund Ltd	320563	1.30	NIL	320563	1.30	NIL	NIL
19	Nahar Capital and Financial Services Ltd	12087671	49.16	NIL	12087671	49.16	NIL	NIL
	<b>Total</b>	<b>17257345</b>	<b>70.19</b>	<b>NIL</b>	<b>17257345</b>	<b>70.19</b>	<b>NIL</b>	<b>NIL</b>

*\*Change in shareholding due to Inter-se transfer among the promoter group under Regulation 10 of SEBI Substantial Acquisition of Shares and Takeover) Regulations, 2011.*

**(iii) Change in Promoters' Shareholding (please specify, if there is no change)**

S N	Particulars	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
	At the beginning of the year	17257345	70.19	17257345	70.19
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase / decrease (e.g. allotment/transfer/bonus/sweat equity etc.):	<b>No Change</b>			
	At the end of the year	17257345	70.19	17257345	70.19

**(iv) Shareholding Pattern of top ten Shareholders***(Other than Directors, Promoters and Holders of GDRs and ADRs):*

SN		Shareholding at the beginning (01.04.2018)/ end of the year (31.03.2019)		Date wise Increase/Decrease in Shareholding during the year			Cumulative Shareholding during the year (01.04.2018 to 31.03.2019)	
		No. of shares	% of total shares of the Company	Date	Increase/ decrease in Shareholding	Reason	No. of shares	% of total shares of the Company
1	IEPF, Ministry of Corporate Affairs	404694	1.65	01.04.2018				
				07.12.2018	29843	Transfer	434537	1.77
				21.12.2018	1930	Transfer	436467	1.78
				31.12.2018	45117	Transfer	481584	1.96
				11.01.2019	2120	Transfer	483704	1.97
		483704	1.97	31.03.2019				
2	Subramanian P	348370	1.42	01.04.2018				
				06.04.2018	5220	Purchase	353590	1.44
				18.05.2018	2700	Purchase	356290	1.45
				25.05.2018	7403	Purchase	363693	1.48
				01.06.2018	1302	Purchase	364995	1.48
				08.06.2018	990	Purchase	365985	1.49
				22.06.2018	1161	Purchase	367146	1.49
				20.07.2018	3544	Purchase	370690	1.51
				03.08.2018	3890	Purchase	374580	1.52
				17.08.2018	970	Purchase	375550	1.53
				23.09.2018	-27180	Sale	348370	1.42
				28.09.2018	28980	Purchase	377350	1.53
				03.10.2018	1440	Purchase	378790	1.54
				12.10.2018	11160	Purchase	389950	1.59
				26.10.2018	2820	Purchase	392770	1.60
02.11.2018	1953	Purchase	394723	1.61				
09.11.2018	1167	Purchase	395890	1.61				
16.11.2018	3600	Purchase	399490	1.62				

				23.11.2018	14580	Purchase	414070	1.68
				11.01.2019	270	Purchase	414340	1.69
				18.01.2019	1350	Purchase	415690	1.69
				25.01.2019	900	Purchase	416590	1.69
				15.02.2019	11600	Purchase	428190	1.74
				22.02.2019	2800	Purchase	430990	1.75
				01.03.2019	22138	Purchase	453128	1.84
				08.03.2019	3422	Purchase	456550	1.86
		456550	1.86	31.03.2019				
3	Hasmukh Parekh	150000	0.61	01.04.2018				
				25.05.2018	13000	Purchase	163000	0.66
				23.09.2018	-13000	Sale	150000	0.61
		163000	0.66	28.09.2018	13000	Purchase	163000	0.66
				31.03.2019				
4	Sangeetha S	76390	0.31	01.04.2018				
				13.04.2018	1575	Purchase	77965	0.32
				20.04.2018	7200	Purchase	85165	0.35
				04.05.2018	4595	Purchase	89760	0.37
				11.05.2018	8410	Purchase	98170	0.40
				18.05.2018	5220	Purchase	103390	0.42
				15.06.2018	8827	Purchase	112217	0.46
				22.06.2018	10253	Purchase	122470	0.50
				29.06.2018	5220	Purchase	127690	0.52
				20.07.2018	2880	Purchase	130570	0.53
				03.08.2018	6120	Purchase	136690	0.56
				23.09.2018	-60300	Sale	76390	0.31
				28.09.2018	60300	Purchase	136690	0.56
				31.12.2018	3204	Purchase	139894	0.57
				11.01.2019	1106	Purchase	141000	0.57
		141000	0.57	31.03.2019				
5	*Jainam Properties Private Limited	0	0.00	01.04.2018				
				29.03.2019	117930	Purchase	117930	0.48
		117930	0.48	31.03.2019				
6	Cello Pens & Stationery Pvt. Ltd.	55000	0.22	01.04.2018		Nil movement during the year	55000	0.22
		55000	0.22	31.03.2019				
7	*C.D. Integrated Services Limited	32276	0.13	01.04.2018				
				01.06.2018	-32276	Sale	0	0.00
				23.09.2018	32276	Purchase	32276	0.13
				28.09.2018	-32276	Sale	0	0.00
				12.10.2018	50347	Purchase	50347	0.20
				19.10.2018	-50347	Sale	0	0.00
				26.10.2018	50347	Purchase	50347	0.20
				02.11.2018	-50347	Sale	0	0.00
				16.11.2018	50347	Purchase	50347	0.20
				07.12.2018	-50347	Sale	0	0.00
				18.01.2019	49469	Purchase	49469	0.20
				15.02.2019	-49469	Sale	0	0.00
				08.03.2019	49469	Purchase	49469	0.20
				15.03.2019	5000	Purchase	54469	0.22
		54469	0.22	31.03.2019				
8	Deenbandhu Jalan	49972	0.20	01.04.2018				
				17.08.2018	370	Purchase	50343	0.20
				23.09.2018	-370	Sale	49972	0.20

		50343	0.20	28.09.2018 31.03.2019	370	Purchase	50343	0.20
9	Lachman Kishan Chand	50000	0.20	01.04.2018		Nil movement during the year	50000	
		50000	0.20	31.03.2019				
10	*Manish Innani	46637	0.19	01.04.2018		Nil movement during the year	46637	0.05
		46637	0.19	31.03.2019				0.19
11	*Dilip S. Solanki	31000	0.13	01.04.2018				
				25.05.2018	2000	Purchase	33000	0.13
				17.08.2018	1000	Purchase	34000	0.14
				23.09.2018	-3000	Sale	31000	0.13
				28.09.2018	4000	Purchase	35000	0.14
				21.12.2018	3000	Purchase	38000	0.15
				29.03.2019	3000	Purchase	41000	0.17
		41000	0.17	31.03.2019				
12	**Ajay Parakh	74722	0.30	01.04.2018				
				25.05.2018	100	Purchase	74822	0.30
				08.06.2018	705	Purchase	75527	0.31
				15.06.2018	200	Purchase	75727	0.31
				29.06.2018	1727	Purchase	77454	0.32
				06.07.2018	681	Purchase	78135	0.32
				23.09.2018	1269	Purchase	79404	0.32
				28.09.2018	-1269	Sale	78135	0.32
				21.12.2018	200	Purchase	78335	0.32
				22.02.2019	-412	Sale	77923	0.32
				29.03.2019	-77500	Sale	423	0.00
		423	0.00	31.03.2019				
13	**Shreekant Varun Phumbhra	70000	0.28	01.04.2018				
				18.05.2018	-70000	Sale	0	0.00
				23.09.2018	70000	Purchase	70000	0.28
				28.09.2018	-70000	Sale	0	0.00
		0	0.00	31.03.2019				
14	**Rathi Financial Services Ltd.	40187	0.16	01.04.2018		Nil movement during the year	40187	0.16
		40187	0.16	31.03.2019				

\*Not in the list of Top 10 shareholders as on 01.04.2018. The same has been reflected above since the shareholder was one of the Top 10 shareholders as on 31.03.2019.

\*\*Ceased to be in the list of Top 10 shareholders as on 31.03.2019. The same is reflected above since the shareholder was one of the Top 10 shareholders as on 01.04.2018.

**(v) Shareholding of Directors and Key Managerial Personnel:**

S N	Shareholding of each Directors and each Key Managerial Personnel	Date	Reason	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
1	Mr. Dinesh Gogna						
	At the beginning of the year	01.04.2018		700	0.00	700	0.00
	Changes during the year		Purchase	1427	0.01	1427	0.01
	At the end of the year	31.03.2019		2127	0.01	2127	0.01

*Note: Mr. Dinesh Oswal & Mr. Kamal Oswal are the directors of the Company. They are also promoters of the Company & their holding of share has been included in the promoter category (In point B i.e Shareholding of Promoters at S.no 1 & 2 respectively.)*

**V. INDEBTEDNESS**

Indebtedness of the Company including interest outstanding/accrued but not due for payment.

(Rs. In Lacs)

Particulars	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
<b>Indebtedness at the beginning of the financial year</b>				
i) Principal Amount	85883428	NIL	NIL	85883428
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	NIL	NIL	NIL
<b>Total (i+ii+iii)</b>	85883428	NIL	NIL	85883428
<b>Change in Indebtedness during the financial year</b>				
* Addition	NIL	NIL	NIL	NIL
* Reduction	85811698	NIL	NIL	85811698
Net Change	85811698	NIL	NIL	85811698
<b>Indebtedness at the end of the financial year</b>				
i) Principal Amount	71730	NIL	NIL	71730
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	NIL	NIL	NIL
<b>Total (i+ii+iii)</b>	71730	NIL	NIL	71730



## VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

### A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

Sl. no.	Particulars of Remuneration	Name of Director	Total Amount
		<b>Mr. Satish Kumar Sharma (Executive Director)</b>	
1.	Gross salary (a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961 (b) Value of perquisites u/s 17(2) Income-tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	24,60,925	24,60,925
2.	Stock Option	--	--
3.	Sweat Equity	--	--
4.	Commission - as % of profit - others, specify...	--	--
5.	Others, please specify	--	--
	Total (A)	<b>24,60,925</b>	<b>24,60,925</b>
	Ceiling as per the Act	5% of Net Profits of the company being Rs.65 Lacs	

### B. Remuneration to other directors:

Sl. no.	Particulars of Remuneration	Name of Directors						Total Amount
	Independent Directors	<b>Dr. A. S. Sohi</b>	<b>Dr. Y. P. Sachdeva</b>	<b>Dr. S.K. Singla</b>	<b>Dr. Inder Mohan Chhibba</b>	<b>Dr. Vijay Asdhir</b>	<b>Dr. Manisha Gupta</b>	
	• Fee for attending board /committee meetings	30000	40000	20000	40000	40000	40000	210000
	• Commission	--	--	--	--	--	--	--
	• Others, please specify	--	--	--	--	--	--	--
	Total (1)	<b>30000</b>	<b>40000</b>	<b>20000</b>	<b>40000</b>	<b>40000</b>	<b>40000</b>	<b>210000</b>
	Other Non-Executive Directors	<b>Mr. Jawahar Lal Oswal</b>	<b>Mr. Dinesh Oswal</b>	<b>Mr. Kamal Oswal</b>	<b>Mr. Dinesh Gogna</b>	<b>Mr. Komal Jain</b>	--	
	• Fee for attending board committee meetings	40000	40000	40000	40000	40000	--	200000
	• Commission	--	--	--	--	--	--	--
	• Others, please specify	--	--	--	--	--	--	--
	Total (2)	<b>40000</b>	<b>40000</b>	<b>40000</b>	<b>40000</b>	<b>40000</b>		<b>200000</b>
	Total (B) = (1 + 2)	<b>70000</b>	<b>80000</b>	<b>60000</b>	<b>80000</b>	<b>80000</b>	<b>40000</b>	<b>410000</b>
	Total Managerial Remuneration	<b>70000</b>	<b>80000</b>	<b>60000</b>	<b>80000</b>	<b>80000</b>	<b>40000</b>	<b>410000</b>
	Overall Ceiling as per the Act	11% of the Net Profits of the company being Rs. 143 Lacs						

**C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTD**

Sl. no.	Particulars of Remuneration	Key Managerial Personnel			
		CEO	Company Secretary	CFO	Total
		--	Mrs. Nidhi Khande	Mr. Rakesh Jain	
1.	Gross salary (a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961 (b) Value of perquisites u/s 17(2) Income-tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961		372219	987477	
2.	Stock Option		--	--	
3.	Sweat Equity		--	--	
4.	Commission - as % of profit - others, specify...		--	--	
5.	Others, please specify		--	--	
	<b>Total</b>		<b>372219</b>	<b>987477</b>	

**VII. PENALTIES/PUNISHMENT/COMPOUNDING OF OFFENCES:**

Type	Section of the Companies Act	Brief Description	Details of Penalty/ Punishment/ Compounding fees imposed	Authority [RD/NCLT/ COURT]	Appeal made, if any (give Details)
<b>A. COMPANY</b>					
Penalty	--	--	--	--	--
Punishment	--	--	--	--	--
Compounding	--	--	--	--	--
<b>B. DIRECTORS</b>					
Penalty	--	--	--	--	--
Punishment	--	--	--	--	--
Compounding	--	--	--	--	--
<b>C. OTHER OFFICERS IN DEFAULT</b>					
Penalty	--	--	--	--	--
Punishment	--	--	--	--	--
Compounding	--	--	--	--	--

**FOR AND ON BEHALF OF THE BOARD**

**PLACE: LUDHIANA  
DATED: 13<sup>TH</sup> AUGUST, 2019**

**JAWAHAR LAL OSWAL  
(CHAIRMAN)  
(DIN: 00463866)**