

FORM NO. MGT 9
EXTRACT OF ANNUAL RETURN
As on financial year ended on 31.03.2020

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

I. REGISTRATION & OTHER DETAILS:		
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. 4E/2, Jhandewalan Extension New Delhi-110055 Tel: +(011) 23541234 Fax: +(011) 41540064 E-mail Address: rta@alankit.com

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY			
(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

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES					
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)

f) Insurance Companies									
g) FIIs									
h) Foreign Venture Capital Funds									
i) Others (FII'S)									
Sub-total (B)(1):-	2054	654	2708	0.01	2254	654	2908	0.01	0.00
2. Non-Institutions									
a) Bodies Corp.									
i) Indian	489574	5962	495536	2.02	362780	4343	367123	1.49	-0.53
ii) Overseas									
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 1 lakh	3901770	1070110	4971880	20.22	3949556	911090	4860646	19.77	-0.45
ii) Individual shareholders holding nominal share capital in excess of Rs 1lakh	1016655	-	1016655	4.13	950964	-	950964	3.87	-0.26
c) NBFC registered with RBI	543	-	543	0.00	-	-	-	-	0.00
d) Others (specify)	835014	8310	843324	3.43	1114901	7890	1122791	4.57	+1.14
Non Resident Indians	154307	8310	162617	0.66	160413	7890	168303	0.69	+0.03
Clearing Member	-	-	-	0.00	3420	-	3420	0.01	+0.01
Directors and Relatives	3627	-	3627	0.01	2127	-	2127	0.01	0.00
HUF	193376	-	193376	0.79	333592	-	333592	1.36	+0.57
IEPF	483704	-	483704	1.97	615349	-	615349	2.50	+0.53
Sub-total (B)(2):-	6243556	1084382	7327938	29.80	6378201	923323	7301524	29.70	-0.1
Total Public (B)	6245610	1085036	7330646	29.81	6380455	923977	7304432	29.71	-0.1

C. Shares held by Custodian for GDRs & ADRs									
Grand Total (A+B+C)	23502955	1085036	24587991	100.00	23664014	923977	24587991	100.00	0.00

(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.	Dinesh Oswal	105273	0.43	NIL	105273	0.43	NIL	NIL
2.	*Jawahar Lal Oswal	0	0.00	NIL	21214	0.09	NIL	+0.09
3.	Kamal Oswal	31500	0.13	NIL	31500	0.13	NIL	NIL
4.	*Sambhav Oswal	0	0.00	NIL	1000	0.00	NIL	0.00
5.	*Tanvi Oswal	0	0.00	NIL	1000	0.00	NIL	0.00
6.	*Ritu Oswal	0	0.00	NIL	1000	0.00	NIL	0.00
7.	*Manisha Oswal	0	0.00	NIL	500	0.00	NIL	0.00
8.	*Sanjana Oswal	0	0.00	NIL	500	0.00	NIL	0.00
9.	*Rishabh Oswal	0	0.00	NIL	500	0.00	NIL	0.00
10.	*Abhinav Oswal	0	0.00	NIL	500	0.00	NIL	0.00
11.	**Nahar Spinning Mills Ltd.	1253603	5.10	NIL	4248813	17.28	NIL	+12.18
12.	Nahar Capital and Financial Services Ltd	12087671	49.16	NIL	12087671	49.16	NIL	NIL
13.	**Sankheshwar Holding Co. Ltd	630471	2.56	NIL	784088	3.19	NIL	+0.63
14.	**Abhilash Growth Fund (P) Limited	178025	0.72	NIL	0	0.00	NIL	-0.72
15.	**Atam Vallabh Financiers Ltd	81985	0.33	NIL	0	0.00	NIL	-0.33
16.	**J L Growth Fund Ltd	320563	1.30	NIL	0	0.00	NIL	-1.30

17.	**Kovalam Investment & Trading Co. Ltd.	213037	0.87	NIL	0	0.00	NIL	-0.87
18.	**Monica Growth Fund (P) Ltd	112560	0.46	NIL	0	0.00	NIL	-0.46
19.	**Nagdevi Trading & Investment Co Ltd	716080	2.91	NIL	0	0.00	NIL	-2.91
20.	**Nahar Growth Fund (P) Ltd	46933	0.19	NIL	0	0.00	NIL	-0.19
21.	**Nahar Industrial Enterprises Ltd	0	0.00	NIL	0	0.00	NIL	NIL
22.	**Neha Credit And Investment (P) Ltd	27389	0.11	NIL	0	0.00	NIL	-0.11
23.	**Oswal Woolen Mills Ltd.	153617	0.62	NIL	0	0.00	NIL	-0.62
24.	**Ruchika Growth Fund (P) Ltd	112560	0.46	NIL	0	0.00	NIL	-0.46
25.	**Vanaik Investors Ltd	90669	0.37	NIL	0	0.00	NIL	-0.37
26.	**Vardhman Investments Ltd	988253	4.02	NIL	0	0.00	NIL	-4.02
27.	**Vanaik Spinning Mills Ltd	107156	0.44	NIL	0	0.00	NIL	-0.44
	Total	17257345	70.19	NIL	17283559	70.29	NIL	+0.1

* During the year 2019-20, Promoters have purchased shares through Open Market.

** Change in shareholding of Promoter Group 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)

SN	Particulars	Shareholding at the beginning (01.04.2019)/ end of the year (31.03.2020)		Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase / decrease (e.g. allotment/transfer/bonus/sweat equity etc.):			Cumulative Shareholding during the year (01.04.2019 to 31.03.2020)	
		No. of shares	% of total shares	Date	Increase/ Decrease	Reason	No. of shares	% of total shares
1.	Jawahar Lal Oswal	0	0.00	01.04.2019				
				18.09.2019	1000	Purchase	1000	0.00
				19.03.2020	20214	Purchase	21214	0.09
		21214	0.09	31.03.2020				
2.	Sambhav Oswal	0	0.00	01.04.2019				
				06.12.2019	1000	Purchase	1000	0.00
		1000	0.00	31.03.2020				
3.	Tanvi Oswal	0	0.00	01.04.2019				
				09.12.2019	1000	Purchase	1000	0.00
		1000	0.00	31.03.2020				
4.	Ritu Oswal	0	0.00	01.04.2019				
				06.12.2019	1000	Purchase	1000	0.00
		1000	0.00	31.03.2020				
5.	Manisha Oswal	0	0.00	01.04.2019				
				28.02.2020	500	Purchase	500	0.00
		500	0.00	31.03.2020				
6.	Sanjana Oswal	0	0.00	01.04.2019				
				28.02.2020	500	Purchase	500	0.00
		500	0.00	31.03.2020				
7.	Rishabh Oswal	0	0.00	01.04.2019				
				28.02.2020	500	Purchase	500	0.00
		500	0.00	31.03.2020				
8.	Abhinav Oswal	0	0.00	01.04.2019				
				28.02.2020	500	Purchase	500	0.00
		500	0.00	31.03.2020				
9.	Nahar Spinning Mills Ltd.	1253603	5.10	01.04.2019				
				11.09.2019	2995210	Inter Se Transfer	4248813	17.28
		4248813	17.28	31.03.2020				
11.	Sankheshwar Holding Co. Ltd	630471	2.56	01.04.2019				
				11.09.2019	153617	Inter Se Transfer	784088	3.19
		784088	3.19	31.03.2020				
12.	Abhilash Growth Fund (P) Limited	178025	0.72	01.04.2019				
				11.09.2019	-178025	Inter Se Transfer	0	0.00
		0	0.00	31.03.2020				
13.	Atam Vallabh Financiers Ltd	81985	0.33	01.04.2019				
				11.09.2019	-81985	Inter Se Transfer	0	0.00
		0	0.00	31.03.2020				
14.	J L Growth Fund Ltd	320563	1.30	01.04.2019				
				11.09.2019	-320563	Inter Se Transfer	0	0.00
		0	0.00	31.03.2020				

15.	Kovalam Investment & Trading Co. Ltd.	213037 0	0.87 0.00	01.04.2019 11.09.2019 31.03.2020	-213037	Inter Se Transfer	0	0.00
16.	Monica Growth Fund (P) Ltd	112560 0	0.46 0.00	01.04.2019 11.09.2019 31.03.2020	-112560	Inter Se Transfer	0	0.00
17.	Nagdevi Trading & Investment Co Ltd	716080 0	2.91 0.00	01.04.2019 11.09.2019 31.03.2020	-716080	Inter Se Transfer	0	0.00
18.	Nahar Growth Fund (P) Ltd	46933 0	0.19 0.00	01.04.2019 11.09.2019 31.03.2020	-46933	Inter Se Transfer	0	0.00
19.	Neha Credit And Investment (P) Ltd	27389 0	0.11 0.00	01.04.2019 11.09.2019 31.03.2020	-27389	Inter Se Transfer	0	0.00
20.	Oswal Woolen Mills Ltd.	153617 0	0.62 0.00	01.04.2019 11.09.2019 31.03.2020	-153617	Inter Se Transfer	0	0.00
21.	Ruchika Growth Fund (P) Ltd	112560 0	0.46 0.00	01.04.2019 11.09.2019 31.03.2020	-112560	Inter Se Transfer	0	0.00
22.	Vanaik Investors Ltd	90669 0	0.37 0.00	01.04.2019 11.09.2019 31.03.2020	-90669	Inter Se Transfer	0	0.00
23.	Vardhman Investments Ltd	988253 0	4.02 0.00	01.04.2019 11.09.2019 31.03.2020	-988253	Inter Se Transfer	0	0.00
24.	Vanaik Spinning Mills Ltd	107156 0	0.44 0.00	01.04.2019 11.09.2019 31.03.2020	-107156	Inter Se Transfer	0	0.00

(iv) Shareholding Pattern of top ten Shareholders

(Other than Directors, Promoters and Holders of GDRs and ADRs):

SN	For each of the Top 10 shareholders	Shareholding at the beginning (01.04.2019)/ end of the year (31.03.2020)		Date wise Increase/Decrease in Shareholding during the year			Cumulative Shareholding during the year (01.04.2019 to 31.03.2020)	
		No. of shares	% of total shares of the Company	Date	Increase / decrease	Reason	No. of shares	% of total shares of the Company
1	IEPF, Ministry of Corporate Affairs	483704	1.97	01.04.2019				
				24.05.2019	-196	Released	483508	1.97
				31.05.2019	-560	Released	482948	1.96
				28.06.2019	-824	Released	482124	1.96
				06.12.2019	133225	Transfer	615349	2.50
		615349	2.50	31.03.2020				

2	Sangeetha S	141000	0.57	01.04.2019					
				08.11.2019	456550	Purchase	597550	2.43	
				15.11.2019	935	Purchase	598485	2.43	
				22.11.2019	3115	Purchase	601600	2.45	
		601600	2.45	31.03.2020					
3	Hasmukh Parekh	163000	0.66	01.04.2019		Nil	163000	0.66	
						movement			
		163000	0.66	31.03.2020		during the			
						year			
4	Veena Parakh	46	0.00	01.04.2019					
				24.05.2019	117930	Purchase	117976	0.48	
				23.08.2019	-500	Sale	117476	0.48	
				13.09.2019	105	Purchase	117581	0.48	
				13.03.2020	-1126	Sale	116455	0.47	
				20.03.2020	1-5168	Sale	101287	0.41	
				27.03.2020	-2560	Sale	98727	0.40	
		98727	0.40	31.03.2020					
5	Cello Pens & Stationery Pvt. Ltd.	55000	0.22	01.04.2019		Nil	55000	0.22	
						movement			
		55000	0.22	31.03.2020		during the			
						year			
6	C.D. Integrated Services Limited	54469	0.22	01.04.2019					
				11.10.2019	-54469	Sale	0	0.00	
				18.10.2019	54469	Purchase	54469	0.22	
		54469	0.22	31.03.2020					
7	Deenbandhu Jalan	50343	0.20	01.04.2019		Nil	50343	0.20	
						movement			
		50343	0.20	31.03.2020		during the			
						year			
8	Lachman Kishan Chand	50000	0.20	01.04.2019		Nil	50000	0.20	
						movement			
		50000	0.20	31.03.2020		during the			
						year			
9	Manish Innani	46637	0.19	01.04.2019		Nil	46637	0.19	
						movement			
		46637	0.19	31.03.2020		during the			
						year			
10	Dilip S. Solanki	41000	0.17	01.04.2019		Nil	41000	0.17	
						movement			
		41000	0.17	31.03.2020		during the			
						year			

(v) Shareholding of Directors and Key Managerial Personnel:

SN	Director	Shareholding at the beginning (01.04.2019)/ end of the year (31.03.2020)		Date wise Increase/Decrease in Shareholding during the year			Cumulative Shareholding during the year (01.04.2019 to 31.03.2020)	
		No. of shares	% of total shares	Date	Increase/Decrease	Reason	No. of shares	% of total shares
1.	Mr. Jawahar Lal Oswal	0	0	01.04.2019 18.09.2019 19.03.2020 31.03.2020	1000 20214	Purchase Purchase	1000 20214	0.00 0.09
2.	Mr. Dinesh Oswal	105273	0.43	01.04.2019 31.03.2020	0	No Change During the Year	105273	0.43
3.	Mr. Kamal Oswal	31500	0.13	01.04.2019 31.03.2020	0	No Change During the Year	31500	0.13
4.	Mr. Dinesh Gogna	2127	0.00	01.04.2019 31.03.2020	0	No Change During the Year	2127	0.00
5.	Mr. Komal Jain	0	0.00	01.04.2019 31.03.2020	NIL			
6.	Mr. S. K. Sharma	0	0.00	01.04.2019 31.03.2020	NIL			
7.	Dr. S. K. Singla	0	0.00	01.04.2019 31.03.2020	NIL			
8.	Dr. A.S. Sohi	0	0.00	01.04.2019 31.03.2020	NIL			
9.	Dr. Yash Paul Sachdeva	0	0.00	01.04.2019 31.03.2020	NIL			
10.	Dr. Inder Mohan Chhibba	0	0.00	01.04.2019 31.03.2020	NIL			
11.	Dr. Vijay Asdhir	0	0.00	01.04.2019 31.03.2020	NIL			
12.	Dr. Manisha Gupta	0	0.00	01.04.2019 31.03.2020	NIL			

SN	Key Managerial Personnel	Shareholding at the beginning (01.04.2019)/ end of the year (31.03.2020)		Date wise Increase/Decrease in Shareholding during the year			Cumulative Shareholding during the year (01.04.2019 to 31.03.2020)	
		No. of shares	% of total shares	Date	Increase/Decrease	Reason	No. of shares	% of total shares
1.	Mr. S. K. Sharma (Executive Director)	0	0.00	01.04.2019 31.03.2020	NIL			
2.	Mr. Rakesh Kumar Jain (Chief Financial Officer)	0	0.00	01.04.2019 31.03.2020	NIL			
3.	Ms. Bhoomika (Company Secretary)	0	0.00	01.04.2019 31.03.2020	NIL			

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
Indebtedness at the beginning of the financial year				
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
Total (i+ii+iii)	71730	NIL	NIL	71730
Change in Indebtedness during the financial year				
* Addition	35819533	NIL	NIL	35819533
* Reduction	NIL	NIL	NIL	NIL
Net Change	35819533	NIL	NIL	35819533
Indebtedness at the end of the financial year				
i) Principal Amount	35891263	NIL	NIL	35891263
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	NIL	NIL	NIL
Total (i+ii+iii)	35891263	NIL	NIL	35891263

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
		Mr. Satish Kumar Sharma (Executive Director)	
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	26,32,168	26,32,168
2.	Stock Option	--	--
3.	Sweat Equity	--	--
4.	Commission - as % of profit - others, specify...	--	--
5.	Others, please specify	--	--
	Total (A)	26,32,168	26,32,168
	Ceiling as per the Act	5% of Net Profits of the company being Rs. 230 Lacs	

B. Remuneration to other directors:

Sl. no.	Particulars of Remuneration	Name of Directors						Total Amount
		Dr. A. S. Sohi	Dr. Y. P. Sachdeva	Dr. S.K. Singla	Dr. Inder Mohan Chhibba	Dr. Vijay Asdhir	Dr. Manisha Gupta	
	Independent Directors							
	• Fee for attending board /committee meetings	40,000	40,000	60,000	60,000	30,000	60,000	2,90,000
	• Commission	--	--	--	--	--	--	--
	• Others, please specify	--	--	--	--	--	--	--
	Total (1)	40,000	40,000	60,000	60,000	30,000	60,000	2,90,000
	Other Non-Executive Directors							
	• Fee for attending board committee meetings	60,000	60,000	60,000	50,000	60,000	--	2,90,000
	• Commission	--	--	--	--	--	--	--
	• Others, please specify	--	--	--	--	--	--	--
	Total (2)	60,000	60,000	60,000	50,000	60,000		2,90,000
	Total (B) = (1 + 2)	1,00,000	1,00,000	1,20,000	1,10,000	90,000	60,000	5,80,000
	Total Managerial Remuneration	1,00,000	1,00,000	1,20,000	1,10,000	90,000	60,000	5,80,000
	Overall Ceiling as per the Act	11% of the Net Profits of the company being Rs. 506 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 (01.04.2019 to 30.05.2019)	Ms. Bhoomika (w,e,f, 30.05.2019)	Mr. Rakesh Jain	
1.	Gross salary					
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961		83,803	2,26,413	12,73,333	15,83,549
	(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		--	--	--	--
2.	Stock Option		--	--	--	--
3.	Sweat Equity		--	--	--	--
4.	Commission		--	--	--	--
	- as % of profit					
	- others, specify...					
5.	Others, please specify		--	--	--	--
	Total		83,803	2,26,413	12,73,333	15,83,549

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)
A. COMPANY					
Penalty	--	--	--	--	--
Punishment	--	--	--	--	--
Compounding	--	--	--	--	--
B. DIRECTORS					
Penalty	--	--	--	--	--
Punishment	--	--	--	--	--
Compounding	--	--	--	--	--
C. OTHER OFFICERS IN DEFAULT					
Penalty	--	--	--	--	--
Punishment	--	--	--	--	--
Compounding	--	--	--	--	--

FOR AND ON BEHALF OF THE BOARD

**Sd/-
JAWAHAR LAL OSWAL
(CHAIRMAN)
(DIN: 00463866)**

**PLACE : LUDHIANA
DATED: 12TH AUGUST, 2020**