



CORPORATE GOVERNANCE REPORT

A compliance report on Corporate Governance is included in this Annual Report in compliance of Regulation 34(3) read with Schedule V - Part C appended to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto (hereinafter termed as "Listing Regulations").

1. Company's Philosophy on Code of Governance:

The basic philosophy of Corporate Governance of the Company is to achieve business excellence and dedicate itself to increasing long-term shareholders value, keeping in view the need and interest of all its stakeholders, viz. customers, shareholders, employees, regulatory bodies, vendors, bankers, etc.

2. Board of Directors:

Composition and size of the Board:

The Company has an optimal combination of Executive, Non-Executive and Independent Directors to maintain the independence of the Board from the management, which is in conformity with the requirement of Section 149(4) of the Companies Act, 2013 ("the Act") and Regulation 17 of the Listing Regulations.

The Board of Directors of the Company comprises of 10 (Ten) Directors, with 3 (Three) Whole-time Executive Directors and 7 (Seven) are Non-Executive Directors, of which 6 (Six) are Independent Directors, including a woman independent director. The Board is headed by Shri S. V. Kabra, Executive Chairman and Managing Director. The current strength of the Independent Directors on the Board is more than half of the Board of Directors. Independent Directors contributed to the deliberation and decision making process in the meetings. They are acknowledged as leading industrialist and/or professionals in their respective fields.

Board Meetings and attendance:

During the Financial Year 2020-21, four (4) Board Meetings were held on July 09, 2020, August 10, 2020, October 29, 2020 and January 21, 2021. The information as required under the said Regulations was made available to the Board.

Sr. No	Name of the Director	Position / Status	Attendance at		As on March 31, 2021		
			Board Meetings during FY2020-21	Last AGM held on 15.09.2020	Number of External Directorships held #	Number of Memberships/ Chairmanships in Board Committees across all the Companies*	
						Member	Chairman
1.	Shri S. V. Kabra [§]	Executive	4	Yes	6	2	-
2.	Shri S. N. Kabra [§]	Non - Executive Non Independent	4	Yes	2	1	-
3.	Shri A. S. Kabra [€]	Executive	4	Yes	5	1	-
4.	Smt. Ekta A. Kabra [^]	Executive	4	Yes	1	-	-
5.	Shri M. P. Taparia	Non - Executive Independent	4	Yes	4	1	1
6.	Shri Y.B. Desai	Non - Executive Independent	4	Yes	1	-	1
7.	Shri N.C. Chauhan	Non - Executive Independent	4	Yes	-	1	-
8.	Shri B. L. Bagra	Non - Executive Independent	4	Yes	2	2	2
9.	Shri B. Moradian	Non - Executive Independent	3	Yes	3	4	-
10.	Smt. Chitra Andrade [@]	Non - Executive Independent	NA	NA	2	1	-

Includes directorships held in all the Companies, i.e. Private Limited Companies and Foreign Companies.

* A Committee Member or Chairman of the Audit & Stakeholders Relationship Committee in all public limited companies, whether listed or not.

[§] Shri S. V. Kabra and Shri S. N. Kabra are the Promoters and are relatives

[€] Shri A. S. Kabra is a relative of Shri S. V. Kabra and Smt. Ekta A. Kabra

[^] Smt. Ekta A. Kabra is a relative of Shri Anand S. Kabra

[@] Appointed as Additional Director w.e.f. March 05, 2021

None of the Directors on the Board is Member on more than ten (10) committees or Chairman of more than five (5) committees across all the Companies in which they are Directors and the necessary disclosures in this regard have been made by them.

It is confirmed that in the opinion of the Board, the independent directors of the Company fulfill the conditions of independence specified in the said Act and Regulations and are independent of the management.

Skills / Expertise / Competencies of the Board of Directors:

The following is the list of core skills / expertise / competencies identified by the Board of Directors as required in the context of the Company's business and that the said skills are available with the Board Members:

- i) Knowledge on Company's businesses (plastic industry prospects), policies and culture (including the Mission, Vision and Values) major risks / threats and potential opportunities and knowledge of the industry in which the Company operates
- ii) Behavioral skills - attributes and competencies to use their knowledge and skills to contribute effectively to the growth of the Company
- iii) Business Strategy, Sales & Marketing, Corporate Governance, Forex Management, Administration, Decision Making,
- iv) Financial and Management skills,
- v) Technical / Professional skills and specialized knowledge in relation to Company's business.

3. Audit Committee:

Terms of Reference in brief:

The terms of reference of this Committee are wide enough covering the matters specified for Audit Committee, pursuant to Section 177 of the Companies Act, 2013 and said Regulations, inter-alia, including the following:

- Overseeing of the Company's financial reporting process and disclosure of financial information and financial / risk management policies;
- Review of Quarterly Financial Results and Annual Financial Statements, ensuring compliance with regulatory guidelines and Auditor's Report thereon;
- Review of the adequacy of Internal Control Systems, discussion on significant Internal Audit findings, including internal control and weakness, if any, and Risk Management.
- Recommend appointment, removal of Statutory Auditors, Cost Auditors, Internal Auditors, Secretarial Auditors & their remuneration.
- Review Management Discussion & Analysis of financial condition and the Company's Financial Results.
- Review areas of operation of Internal Audit team & their performance.
- Review and approval of material Related Party Transactions and subsequent modification(s) thereto.
- Review and approve appointment of CFO or any other person heading the Finance function.
- Review and monitor the auditor's independence & performance and effectiveness of audit process.
- Scrutiny of inter-corporate loans and investments.
- Valuation of undertakings or assets of the Company, wherever necessary.
- Review utilization of loans & advances from/investment by the holding company in the subsidiary company(ies);
- Review compliance with the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and verify that the systems for internal control are adequate and are operating effectively.

Audit Committee Composition:

In compliance with Section 177 of Companies Act, 2013 read with the Companies (Meeting of Board and its Powers) Rules, 2014 and the said Regulations, Audit Committee has been constituted comprising of four (4) Directors, who are eminent professionals having expert knowledge in the field of Finance, Accounts, Corporate Law and Business Management:

Name of Members	Status	Qualification	Position in Committee	Meetings Attended
Shri Y. B. Desai	Non - Executive Independent	B.A.(Hons), CAIIB	Chairman	4
Shri N. C. Chauhan	Non - Executive Independent	B.Com (Hons) LLB, CAIIB	Member	4
Shri B. L. Bagra	Non - Executive Independent	M.Com, F.C.A	Member	4
Shri B. Moradian	Non - Executive Independent	PG in Management and BE (Mech)	Member	3

Meetings:

- The Audit Committee meetings were held four (4) times during the Financial Year 2020-21 on July 09, 2020, August 10, 2020, October 29, 2020 and January 21, 2021.



- Quorum of the Committee is two (2) Independent Directors as Members.
- The Chief Financial Officer and the Statutory Auditors are permanent invitees at the meeting.
- The Company Secretary acts as a Secretary to the Committee.
- Minutes of each Audit Committee Meeting are placed before the Board Meeting.

4. Nomination and Remuneration Committee:

In compliance with Section 178 of Companies Act, 2013 read with the Companies (Meeting of Board and its Powers) Rules, 2014 and the said Regulations, a Nomination and Remuneration Committee has been constituted comprising of following three non-executive directors:

Name of Members	Status	Qualification	Position in Committee	Meetings Attended
Shri M. P. Taparia	Non - Executive Independent	B.A.	Chairman	1
Shri N. C. Chauhan	Non - Executive Independent	B.Com (Hons) L.L.B. CAIIB	Member	1
Shri Y. B. Desai	Non - Executive Independent	B.A.(Hons), CAIIB	Member	1

Meetings:

- During the Financial Year 2020-21, one (1) meeting of the Nomination and Remuneration Committee was held on July 09, 2020.
- Quorum of the Committee is two (2) Directors as Members.
- The Company Secretary acts as a Secretary to the Committee.
- Minutes of each Nomination and Remuneration Committee Meeting are placed before the Board Meeting.

Terms of Reference in brief:

- formulation of the criteria for determining qualifications, positive attributes and independence of a director and recommend to the board of directors a policy relating to, the remuneration of the directors, key managerial personnel and other employees;
- formulation of criteria for evaluation of performance of independent directors and the board of directors;
- devising a policy on diversity of board of directors;
- identifying persons who are qualified to become directors and who may be appointed in senior management in accordance with the criteria laid down, and recommend to the board of directors their appointment and removal;
- whether to extend or continue the term of appointment of the independent director, on the basis of the report of performance evaluation of independent directors;
- recommend to the board, all remuneration, in whatever form, payable to senior management;
- To carry out any other function as is mandated by the Board from time to time and/ or enforced by any statutory notification, amendment or modification, as may be applicable;
- To perform such other functions as may be necessary or appropriate for the performance of its duties.

Board Evaluation:

The evaluation criteria for assessing the performance of Directors comprises of the following key areas: Attendance at Board and its Committee Meetings, Quality of contribution to Board deliberations, Strategic perspectives or inputs regarding future growth of the Company and its performance, providing perspectives and feedback beyond information provided by the Management, Commitment to the stakeholders' interests. The said criteria has been further elaborated as per SEBI guidance note in this behalf, to bring clarity on the process, streamline it, analyze the results and take corrective actions. A structured questionnaire has been prepared taking into consideration various aspects of the Board's functioning for feedback and response of each Director.

Remuneration Policy and details of remuneration to all the Directors:

Non-Executive Directors were paid sitting fee of ₹ 20,000/- for each Board and Audit Committee meeting attended and ₹10,000/- for each meeting of Nomination and Remuneration Committee, Corporate Social Responsibility Committee and Stakeholders Relationship Committee attended. Total Sitting Fees paid to Non-Executive Directors during the Financial Year 2020-21 was ₹ 7,80,000/-. Non-Executive Directors were not paid any remuneration except sitting fees.

There were no pecuniary relationships or transactions of Non- Executive Directors vis à-vis the Company. The criteria for making payments to the Non-Executive Directors is posted onto website of the Company at <https://www.kolsite.com/Upload/FinancialResult/KET-REMUNERATION-POLICY%20-%202021%20final.pdf>

Overall remuneration paid during Financial Year 2020-21 to the Executive Directors:

(₹ in Lakhs)

Name of Director	Salary	Other Perquisites*	Total
Shri S. V. Kabra	38.87	20.47	59.34
Shri A. S. Kabra	42.98	28.18	71.16
Smt. E. A. Kabra	32.34	21.43	53.77
	114.19	70.08	184.27

* includes HRA and contribution to Provident Fund, Superannuation Fund, medical reimbursement, etc.

Note: Above remuneration is excluding contribution to Group Gratuity Scheme. The Company has not granted Stock Option Scheme to any of its Directors. The Company does not have any Pension Scheme.

5. Stakeholders Relationship Committee:

Stakeholders Relationship Committee, specifically looks into redressing of Shareholders' and Investors' complaints. The Committee has been formed in conformity with Section 177 of the Companies Act, 2013 and the said Regulations comprising of the following Directors:

Name of Members	Status	Position in Committee	Meetings Attended
Shri B. L. Bagra	Non - Executive Independent	Chairman	1
Shri S. V. Kabra	Executive	Member	2
Shri Anand S. Kabra	Executive	Member	2

Name and Designation of Compliance Officer: Ms. Arya K. Chachad, Company Secretary

During the Financial Year 2020-21, two (2) meetings of the Stakeholders Relationship Committee were held on October 29, 2020 and January 21, 2021.

Terms of Reference in brief:

- enquiring into and redressing complaints of Shareholders and Investors and resolving the grievances of security holders of the Company, regarding transfer of shares by way of transmission, name deletion, etc, non-receipt of Dividend warrants and Annual Reports, etc;
- review of measures taken for effective exercise of voting rights by shareholders; review of adherence to the service standards adopted by the Company in respect of various services being rendered by the Registrar & Share Transfer Agent;
- review of the measures taken by the Company for reducing the quantum of unclaimed dividends and ensuring timely receipt of dividend warrants/annual reports/statutory notices by the shareholders of the Company;
- To carry out any other function as is mandated by the Board from time to time and/ or enforced by any statutory notification, amendment or modification, as may be applicable;
- To perform such other functions as may be necessary or appropriate for the performance of its duties.

Nature & Status of Shareholders' Correspondence:

All the requests / correspondence received during the Financial Year ended March 31, 2021, as detailed below, were duly addressed by the Company and / or its Registrar & Transfer Agent, Link Intime India Pvt. Ltd. [erstwhile Sharex Dynamic (India) Pvt. Ltd. on account of its merger with Link Intime India Pvt. Ltd.]. No queries are pending for resolution as of March 31, 2021, except where they are constrained by dispute or legal impediments or due to incomplete or non-submission of documents by the Shareholders.

During the year 2020-21, twenty eight (28) investors' correspondence pertaining to revalidation of Dividend Warrants, non-receipt of corporate entitlements, loss of share certificate/(s), request for physical Annual Report, updating change of address, bank mandate, etc. as detailed hereunder, were received and redressed to the satisfaction of the shareholders.

Sr. No.	Nature of Correspondence	No. of requests Received	No. of cases Resolved	Pending, if any
1.	Revalidation of Dividend Warrants/ Non-receipt of Dividend	15	15	-
2.	Loss of Share Certificate	1	1	-
3.	Updation of Address / Bank Mandate	3	3	-
4.	Request for physical copy of Annual Report	4	4	-
5.	SEBI SCORES / BSE / NSE	-	-	-
6.	Others	1	1	-
7.	Misc. correspondence with BSE/NSE	4	4	-
	TOTAL	28	28	-



All attempts are made to redress the grievances of the shareholders to their satisfaction. All valid requests for transfers, transmission, transposition, etc. have been processed and no complaint was pending in respect thereof as of March 31, 2021.

6. Corporate Social Responsibility Committee (CSR Committee):

CSR Committee has been formed in conformity with Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 comprising of the following Directors:

Name of Members	Status	Position in Committee	Meetings Attended
Shri S. V. Kabra	Executive	Chairman	1
Shri S. N. Kabra	Non – Executive	Member	1
Shri B. L. Bagra	Non – Executive Independent	Member	1
Smt. Ekta A. Kabra *	Executive	Member	-

* inducted as a Member w.e.f. May 21, 2021

Terms of Reference in brief:

- Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII to the Companies Act, 2013;
- Recommend the amount of expenditure to be incurred on the activities referred above along with detailed CSR action plan, modalities of execution, implementation schedule;
- Prepare a transparent monitoring mechanism for ensuring implementation of the projects / programs / activities to be undertaken by the Company;
- Submit to the Board report giving status of the CSR activities undertaken, expenditure incurred and such other details as may be required by it; and
- Such other activities as the Board of Directors may determine from time to time.

A meeting of the CSR Committee was held on January 21, 2021, inter-alia, to consider, recommend and review the CSR spendings and to consider revision in the Company’s CSR Policy.

7. Risk Management Committee:

The Risk Management Committee of the Company is constituted in line with the provisions of Regulation 21 of the Listing Regulations and has been entrusted with the responsibility to assist the Board in (a) monitoring the Company’s Risk Management Framework; (b) reviewing the Risk Management Plan and ensuring its effectiveness and (c) Overseeing all the risks that the organization faces such as strategic, financial, liquidity, security, regulatory, legal and other risks that have been identified and assessed to ensure that there is a sound Risk Management Policy in place to address such concerns / risks.

Terms of Reference in brief:

- To formulate a risk management policy which shall include:
 - (a) A framework for identification of internal and external risks specifically faced by the listed entity, in particular including financial, operational, sectoral, sustainability (particularly, Environmental Social and Governance (ESG) related risks), information, cyber security risks or any other risk as may be determined by the Committee.
 - (b) Measures for risk mitigation including systems and processes for internal control of identified risks.
 - (c) Business continuity plan.
- To ensure that appropriate methodology, processes and systems are in place to monitor and evaluate risks associated with the business of the Company;
- To monitor and oversee implementation of the risk management policy, including evaluating the adequacy of risk management systems;
- To periodically review the risk management policy, at least once in two years, including by considering the changing industry dynamics and evolving complexity;
- To keep the board of directors informed about the nature and content of its discussions, recommendations and actions to be taken;

The Risk Management process covers risk identification, assessment, analysis and mitigation. to frame, implement and monitor the Risk Management Plan for the Company. Major risks identified by the businesses and functions are systematically addressed through mitigating actions on a continuing basis.

During the Financial Year 2020-21, no meeting of Risk Management Committee was held since it was constituted on May 21, 2021. The composition of the Risk Management Committee is as follows:

Name of Members	Status	Position in Committee
Shri Anand S. Kabra	Executive	Chairman
Smt. Ekta A. Kabra	Executive	Member
Shri Boman Moradian	Non – Executive Independent	Member

8. General Body Meetings:

Particulars of the venue and time where previous three (3) Annual General Meetings were held:

Financial Year Ended	AGM Date	Venue	Time
31-03-2018	10-08-2018	Hotel Karl Residency, 36, Lallubhai Park Road, Andheri (West), Mumbai - 400 058	3:00 P.M.
31-03-2019	31-07-2019	Hotel Karl Residency, 36, Lallubhai Park Road, Andheri (West), Mumbai - 400 058	3:30 P.M.
31-03-2020	15-09-2020	Registered Office of the Company, through VC / AOVM	11:00 A.M.

The Special Resolutions passed at the previous three (3) Annual General Meetings are presented herein below:

10-08-2018	<ul style="list-style-type: none"> (i) To charge the Members for service of documents by a particular mode of dispatch (ii) To authorize the Board of Directors invest, give loan, guarantee or provide security to the Related Parties (iii) To add new clause to the Main Object Clause of the Memorandum of Association of the Company (iv) To continue Directorship of Shri Nihalchand C. Chauhan as a Non - Executive Director post attaining age of 75 years (v) To continue Directorship of Shri Mahaveer P. Taparia as a Non - Executive Director post attaining age of 75 years (vi) To continue Directorship of Shri Yagnesh B. Desai as a Non - Executive Director post attaining age of 75 years (vii) To continue Directorship of Shri Satyanarayan G. Kabra as a Non - Executive Director post attaining age of 75 years
31-07-2019	<ul style="list-style-type: none"> (i) To appoint Shri Shreevallabh G. Kabra as a Chairman & Managing Director for a period of 5(five) years with effect from April 01, 2019 to March 31, 2024 (ii) Re - appointment of Shri Mahaveer P. Taparia as an Independent Director for a second term of 2 years from September 09, 2019 to September 08, 2021 (iii) Re - appointment of Shri Yagneshkumar B. Desai as an Independent Director for a second term of 2 years from September 09, 2019 to September 08, 2021 (iv) Re - appointment of Shri Nihalchand C. Chauhan as an Independent Director for a second term of 2 years from September 09, 2019 to September 08, 2021 (v) Payment of remuneration to the Executive Directors in promoter group exceeding 5% of the net profits of the Company under section 198 of the Companies Act, 2013, till the expiry of their respective tenure (vi) Change in the place of keeping of Registers of Members and related records
15-09-2020	<ul style="list-style-type: none"> (i) To re-appoint Mr. Bajrang Lal Bagra (DIN: 00090596) as an Independent Non-Executive Director of the Company, for a period of 5 (five) consecutive years. (ii) To waive the recovery of Rs. 46.12 Lakhs from Mr. S. V. Kabra (DIN: 00015415), Chairman & Managing Director of the Company, paid towards remuneration in excess of limit prescribed under the Companies Act, 2013 ('the Act'), on account of inadequate profits in respect of FY 2019-20. (iii) To waive the recovery of Rs. 46.83 Lakhs from Mr. A. S. Kabra (DIN: 00016010), Managing Director of the Company, paid towards remuneration in excess of limit prescribed under the said Act, on account of inadequate profits in respect of FY 2019-20. (iv) To waive the recovery of Rs. 37.46 Lakhs from Mrs. E. A. Kabra (DIN: 07088898), Director – Strategy of the Company, paid towards remuneration in excess of limit prescribed under the said Act, on account of inadequate profits in respect of FY 2019-20. (v) To renew the approval for remuneration payable to Mr. S. V. Kabra (DIN: 00015415), Chairman & Managing Director on same terms as duly approved by the Members at the 36th AGM, subject to maximum permissible limit specified under Part II Section II of Schedule V to the said Act in the event of any inadequacy or absence of profits in respect of FY 2020-21. (vi) To renew the approval for remuneration payable to Mr. A. S. Kabra (DIN: 00016010), Managing Director on same terms as duly approved by the Members at the 35th AGM subject to maximum permissible limit specified under Part II Section II of Schedule V to the said Act in the event of any inadequacy or absence of profits in respect of FY 2020-21. (vii) To renew the approval for remuneration payable to Mrs. E. A. Kabra (DIN: 07088898), Director- Strategy on same terms as duly approved by the Members at the 34th AGM subject to maximum permissible limit specified under Part II Section II of Schedule V to the said Act in the event of any inadequacy or absence of profits in respect of FY 2020-21.

Postal Ballot:

No resolution was passed through postal ballot under the provisions of the Companies Act and Rules made thereunder.



9. Disclosures:

- The Company does enter into transactions with entities in which some of the Directors of the Company are deemed to be concerned / interested. However, these transactions are in the ordinary course of the Company's business and on an arm's length basis. Directors have regularly made full disclosures to the Board of Directors regarding the nature of their interest in such concerns. Full particulars of the contracts entered into with the concerns in which Directors are directly or indirectly concerned or interested are recorded in the Register of Contracts maintained under Section 189 of the Companies Act, 2013 and the same was placed at every Meeting of Directors, for the noting and approval by the Board. Policy on dealing with Related Party Transactions is available at www.kolsite.com
- Disclosure of the Related Party Transactions have been made in the Annual Report as a Note to the Financial Statements. During the year under review, there were no materially significant related party transactions that may have potential conflict with the interests of the Company at large.
- Disclosure of commodity price risks and commodity hedging activities:
Foreign Currency Transactions were carried out on actual basis and against forward contract booked for the purpose of hedging the exchange fluctuation risks. The Company does not hedge in commodity prices.
- Details of non-compliance by the Company, Penalties/Strictures imposed on the Company by Stock Exchange(s) or Securities Exchange Board of India (SEBI) or any other statutory authority or any matters related to Capital Markets:
There are no penalties or strictures imposed on the Company by the Stock Exchanges or SEBI or any statutory authorities relating to the above. There were no instances of non-compliance of any matter related to the capital market during the last three (3) years.
- Details of Committee recommendations not accepted by the Board: None
- Total fees for all services paid by the Company and its subsidiaries, on a consolidated basis, to the Statutory Auditor and all entities in the network firm / network entity of which statutory auditor is a part: Rs. 6.00 Lakhs for FY2020-21
- Complaints in relation to the Sexual Harassment: Nil

10. Means of Communication:

- Quarterly results are not sent to each shareholder, as the same are published in leading English & Marathi newspapers.
- Quarterly, Half Yearly and Annual Financial Results of the Company immediately after approval of the Board are sent to the Stock Exchange together with a copy of Limited Review Report and Half- yearly Statement of Assets & Liabilities, Audit Report on Annual Accounts, as applicable. These Results are published in the leading newspapers viz. The Business Standard (English) & Sakal (Marathi) respectively, as prescribed.
- All the data related to Quarterly, Annual Financial Results, Shareholding Pattern, etc. are uploaded on the Company's website: www.kolsite.com as required in terms of the said Regulations.
- Management Discussion and Analysis Report forms part of the Annual Report.

11. General Shareholder Information:

General Meeting

Day, Date & Time	: Friday, July 30, 2021 at 11:00 a.m.
Venue	: Registered Office of Company through VC/AOVM
Financial Year	: April 01, 2021 to March 31, 2022
Dividend Payment Date	: The Dividend, if declared, will be paid within 30 days of its declaration at AGM
Date of Book Closure	: July 24, 2021 to July 30, 2021 (both days inclusive)
Reporting of Unaudited/Audited Financial Results	: In respect of Financial Year 2021-22 from April 01, 2021 to March 31, 2022
First Quarter Results	: Before August 14, 2021
Second Quarter Results with Half Year Results	: Before November 14, 2021
Third Quarter Results	: Before February 14, 2022
Audited Results for FY 2021-22	: On or before May 30, 2022
Annual General Meeting for FY 2021-22	: Tentatively by August / September, 2022

Listing on Stock Exchanges:

Name	Address	Stock Code
BSE Ltd.	Phiroze Jeejeebhoy Tower, Dalal Street, Mumbai - 400 001	524109
National Stock Exchange of India Ltd. (NSE)	Exchange Plaza, Plot No. C/1, G - Block, Bandra - Kurla Complex, Bandra (East) Mumbai - 400 051	KABRAEXTRU

The applicable Annual Listing Fees for the Financial Year 2021-22 have been paid to each of the Stock Exchanges, where the equity shares of the Company are listed. During the year under review, the Company had applied for voluntary delisting of its equity shares from BSE Ltd., which was subsequently withdrawn by the Company.

Stock Market Data:

Monthly High/Low price of the Equity Shares of the Company during the Financial Year 2020-21 with the volume traded:

Month	BSE			NSE		
	High (₹)	Low (₹)	Volume	High (₹)	Low (₹)	Volume
April, 2020	55.50	42.05	20593	56.40	41.50	135680
May, 2020	53.60	44.20	39386	53.45	44.00	369380
June, 2020	60.40	44.70	164626	60.40	44.50	1290394
July, 2020	56.90	45.10	136266	56.95	45.10	475386
August, 2020	83.50	49.50	370307	83.80	50.10	1721989
September, 2020	74.20	56.00	97482	74.70	55.15	617191
October, 2020	86.00	67.40	96117	85.00	67.00	622180
November, 2020	82.50	70.20	61037	83.00	73.00	355982
December, 2020	107.70	75.10	302437	108.00	76.10	2845637
January, 2021	115.60	93.10	225541	116.00	92.30	2426383
February, 2021	141.70	99.50	351257	141.95	99.30	3064668
March, 2021	214.85	131.00	1206661	215.00	130.50	10022256

Performance of share price of the Company in comparison to BSE Sensex during the Financial Year 2020-21 is presented on Page No. 123 and forms part of this report.

Dematerialisation of Shares & Liquidity	31464616 (98.63%) of the Equity Shares have been dematerialized till March 31, 2021 out of 31902320 Equity Shares.
Registrar & Transfer Agent	M/s. Link Intime India Private Limited, a SEBI Registered Transfer Agent attends to all the work related to Share Registry in terms of both, Physical and Electronic mode. During the year under review, the Company's erstwhile Registrar and Transfer Agent, M/s. Sharex Dynamic (India) Private Limited, has been merged with M/s. Link Intime India Private Limited.
Address and Contact Details of the Transfer Agent	C 101, 247 Park, L.B.S Marg, Vikhroli West, Mumbai – 400 083, Maharashtra, India Tel: +91 22 4918 6270; Fax : +91 22 4918 6060 E-mail : rnt.helpdesk@linkintime.co.in; Website: www.linkintime.co.in
Share Transfer System	In terms of Regulation 40(1) of SEBI Listing Regulations, as amended from time to time, the Company's shares can be transferred only in dematerialized form with effect from April 01, 2019, except in case of transmission and transposition. Further, SEBI has fixed March 31, 2021 as the cut-off date for re-lodgement of transfer deeds and the shares that are re-lodged for transfer shall be issued only in demat mode. Transfers of equity shares in electronic form are effected through the depositories with no involvement of the Company.

Reconciliation of Share Capital Audit Report as on March 31, 2021:

Reconciliation was carried out every quarter and the report thereon were placed before the Board of Directors and submitted to the Stock Exchanges in relation to Shareholding in Physical and Electronic mode:

Mode of Holding	Number of Shares	% of Shares
Physical	437704	1.37
Electronic	31464616	98.63
	31902320	100.00

Distribution of Shareholding as on March 31, 2021:

No. of Equity Shares	Number of Shareholders	% of Shareholders	Number of Shares	% of Shares
Upto 1000	12898	89.19	2911848	9.13
1001 – 5000	1311	9.06	2810263	8.81
5001 – 10000	145	1.00	1040960	3.26
10001 – 100000	87	0.60	2514316	7.88
Above 100001	21	0.15	22624933	70.92
	14462	100.00	31902320	100.00



Category of Shareholders as on March 31, 2021:

Sr. No.	Category	Number of Shares	% of Shareholding	Number of Shareholders	% of Shareholders
1.	Promoters	18681800	58.56	12	0.08
2.	Public Financial Institutions, Banks & Mutual Funds	4400	0.01	2	0.01
3.	Foreign Portfolio Inv.	254500	0.8	1	0.01
4.	Private Corporate Bodies	1022232	3.2	101	0.7
5.	General Public	10830837	33.95	13492	93.29
6.	NRIs	444112	1.39	343	2.37
7.	Clearing Members	202990	0.64	95	0.66
8.	HUFs	388461	1.22	415	2.87
9.	IEPF MCA ACCOUNT	72988	0.23	1	0.01
		31902320	100.00	14462	100.00

None of the Non-Executive Director, except Shri S. N. Kabra, is holding any Equity Shares of the Company as on March 31, 2021, who holds 2,000 (0.01%) equity shares.

Details of use of Public Funds obtained in last three years	No funds have been raised from public in last three years
Outstanding GDRs / ADRs / Warrants or any Convertible Instruments, its date of conversion and likely impact on Equity	There are no outstanding instruments and hence there will be no dilution of the equity.
Commodity price risk or foreign exchange risk and hedging activities	Forward contracts are booked, as required, to hedge against foreign exchange exposure.
Plant Locations	<ul style="list-style-type: none"> Kabra Industrial Estate, Kachigam, Daman - 396210 259/260/265 (III), Coastal Highway, Dunetha, Daman –396210 Chakan Industrial Area Phase - 2, Plot No. C -22/8, MIDC, Village - Bhamboli, Taluka Khed, Pune - 410501, Maharashtra

Details of Dividends paid & their respective due dates for transfer of unclaimed dividend to Investors Education & Protection Fund (IEPF) are as under:

Date of Declaration of Dividend at AGM	Dividend for the Financial Year	Rate of Dividend	Month & Year of proposed
September 09, 2014	2013 – 2014	30%	October, 2021
August 27, 2015	2014 – 2015	40%	September, 2022
March 09, 2016*	2015 – 2016	45%	April, 2023
July 18, 2017	2016 – 2017	40%	August, 2024
August 10, 2018	2017 – 2018	40%	September, 2025
March 11, 2020*	2019 – 2020	30%	April, 2027

* paid as Interim Dividend and regularized as Final Dividend at the respective AGMs

Transfer of shares to the IEPF Authority:

In terms of Section 124 of the Companies Act, 2013 read with the Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016, the unpaid/ unclaimed dividends pertaining to all the Financial Years up to and including FY 2012-13 have been transferred to IEPF. The said provisions further requires that all the shares in respect of which the dividends has not been paid or claimed for seven consecutive years or more, shall also be transferred to the demat account of IEPF Authority. Accordingly, during the year under review, the Company has transferred 6,764 equity shares to the credit of the IEPF Authority and has uploaded the relevant details on the Company's website at www.kolsite.com

Unclaimed Suspense Account:

Members are requested to note that in terms of said Regulations, the Company had transferred 108900 Equity Shares into one folio in the name of "Unclaimed Suspense Account" and the same are held in dematerialized mode.

Disclosure with respect to Demat Suspense Account/Unclaimed Suspense Account as required under Schedule 5(F) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 in respect of changes during FY 2020-21 is presented hereunder:

Particulars	Number of Shareholders	Number of Equity Shares
a) Aggregate number of shareholders and the outstanding Unclaimed Suspense Account as on April 01, 2020	141	99700
b) Number of shareholders who approached the Company for transfer of shares from the Unclaimed Suspense Account during the year	-	-
c) Number of shareholders to whom the shares were Unclaimed Suspense Account during the year	-	-
d) Aggregate number of shareholders and the outstanding Unclaimed Suspense Account as on March 31, 2021	141	99700
e) It is hereby confirmed that the voting rights on these shares shall remain frozen till the rightful owner of such shares claims the shares.		

Credit Rating:

The Credit Rating of the Company obtained from CRISIL is as under:

Long Term Rating	CRISIL A/Stable (Reaffirmed)
Short Term Rating	CRISIL A1 (Reaffirmed)

Whistle-Blower Policy:

Pursuant to Section 177 (9) and (10) of the Companies Act, 2013 and said Regulations, the Company has a Whistle-Blower Policy for establishing a vigil mechanism for Directors and employees to report genuine concerns regarding unethical behavior, actual or suspected fraud or violation of the Company's Code of Conduct and Ethics Policy. It is affirmed that no employee of the Company was denied access to the Audit Committee. The said Policy has been hosted on the website of the Company at www.kolsite.com.

SEBI Complaints Redress System (SCORES):

Securities and Exchange Board of India (SEBI) administers a centralized web based complaints redress system (SCORES). It enables investors to lodge and follow-up complaints and track the status of redressal online on the website of SEBI at <https://scores.gov.in>. The Company has registered itself on SCORES and endeavours to resolve all investor complaints received through SCORES or otherwise within 15 days of the receipt of the complaint. During the year, the company has not received any complaint through SCORES.

Address for Correspondence:

Members holding shares in physical form are requested to lodge their application for share transposition, transmission and request for changes in their addresses, bank account and mandate etc. with M/s. Link Intime India Pvt. Ltd., at C 101, 247 Park, L.B.S Marg, Vikhroli (West), Mumbai - 400 083 and for the queries on Annual Report and Dividend, Members are requested to write to the Company at 1001, Fortune Terraces, 'B' Wing, New Link Road, Andheri (West), Mumbai – 400053.

Designated email id for investors : ket_sd@kolsitegroup.com

For and on behalf of the Board

Place : Mumbai
Date : May 21, 2021



S. V. Kabra
Chairman & Managing Director
(DIN: 00015415)

Details of Directorship(s) held in listed Entity/(ies):

Sr. No.	Name of the Director	Name of the Listed Entities	Category of Directorship	Skills / expertise / competence
1.	Mr. Shreevallabh G. Kabra	Plastiblends India Ltd.	Non-Executive, Non-Independent Director	Knowledge on Company's businesses, plastic industry prospects, policies and culture (incl. Mission, Vision & Values) major risks / threats and potential opportunities, Business Strategy, Sales & Marketing
2.	Mr. Satyanarayan G. Kabra	Plastiblends India Ltd.	Chairman Non-Independent Director	
3.	Mr. Anand S. Kabra	-	-	
4.	Mrs. Ekta A. Kabra	-	-	
5.	Mr. Mahaveer Prasad Taparia	The Supreme Industries Ltd. Supreme Petrochem Ltd.	Managing Director Chairman	Financial and Management skills, Forex Management
6.	Mr. Nihalchand C. Chauhan	-	-	
7.	Mr. Yagnesh B. Desai	-	-	Corporate Governance, Legal, Decision Making, behavioral skills- attributes & competencies to use their knowledge and skills
8.	Mr. Bajrang Lal Bagra	Plastiblends India Ltd.	Non-Executive, Independent Director	
9.	Mr. Boman Moradian	Garware Hi-Tech Films Ltd. (formerly known as Garware Polyester Ltd.)	Non-Executive, Independent Director	
10.	Mrs. Chitra Andrade	-	-	Finance and Management skills

For and on behalf of the Board

Place : Mumbai
Date : May 21, 2021

S. V. Kabra
Chairman & Managing Director
(DIN: 00015415)