



Combined Report of Scrutinizer (Postal Ballot with E-voting facility)
[Pursuant to Sections 108 & 110 of the Companies Act, 2013 and Rules 20 & 22 of the Companies (Management and Administration) Rules, 2014]

To,
The Chairman
SHUBHAM POLYSPIN LIMITED
Block No. 748, Saket Industrial Estate,
Nr. Kaneria Oil Mill, Jetpura- Basantpura Road,
Borisana, Taluka Kadi, Mahesana 382728 Gujarat

Dear Sir,

1. I, CS Manoj R. Hurkat, Practicing Company Secretary, have been appointed as a Scrutinizer by the Board of Directors of Shubham Polyspin Limited (“Company”) at their meeting held on 12th November, 2020 for the purpose of scrutinizing the Postal ballot process with E-voting facility and for ascertaining the majority on the Postal Ballot with E-voting facility carried out as per the provisions of Sections 108 and 110 of the Companies Act, 2013 read with Rules 20 and 22 of the Companies (Management and Administration) Rules, 2014 as well as Regulation 277 of the SEBI (ICDR) Regulations, 2018, as contained in the Notice of the Postal Ballot dated 12th November, 2020 circulated by the Company to the Equity shareholders of the Company in the prescribed manner.
2. The management of the Company is responsible to ensure the compliances with the requirements of provisions of the Companies Act, 2013 and Rules relating to voting through electronic means and Postal Ballot on the resolution set out in Postal Ballot Notice. My responsibility as a Scrutinizer for the voting process is restricted to ensure that the process of Postal Ballot with E-voting is conducted in a fair and transparent manner and make the Scrutinizer’s Report of the votes cast “in favour” or “against” the resolution stated below, based on scrutiny of the electronic ballots received from the members on the reports generated from the e-voting system provided by the Central Depository Services (India) Limited (“CDSL”), the authorized agency to provide e-voting facilities, appointed by the Company.

3. In view of Circular No. 14/2020 dated April 8, 2020, Circular No. 17/2020 dated April 13, 2020 and Circular No. 33/2020 dated September 28, 2020, issued by the Ministry of Corporate Affairs (“MCA”) and SEBI/HO/CFD/CMD1/CIR/P/2020/79 dated 12th May, 2020 issued by SEBI (hereinafter collectively referred to as “MCA/ SEBI Circulars”) the resolution is proposed to be passed as a Special Resolution by the Members of Shubham Polyspin Limited (“Company”) through Postal Ballot only by voting through electronic means (“Postal Ballot with e-voting”).
4. The Company has, through its Registrar and Transfer Agent (RTA) viz. Link In time India Private Limited, on 30th November, 2020, completed the dispatch/sending of notice of postal ballot together with explanatory statement setting out material facts etc. to 55 equity shareholders whose E-mail IDs were available.
5. Further to the above, I submit my report as under:
 - a. I assumed the office as Scrutinizer w.e.f. 12th November, 2020.
 - b. The Company has appointed Central Depository System Limited to provide platform for e-voting. The e-voting facility was provided by CDSL on their portal i.e. <https://www.evotingindia.com>.
 - c. It has also been intimated that the Company has published the public notice under Rule 22 (3) of the Companies (Management & Administration) Rules, 2014 by way of an advertisement published on 2nd December, 2020 in “Free Press Gujarat” (English Language) and “Lokmitra” (Gujarati Language).
 - d. The Postal ballot with E-voting facility period remained open from Friday, 4th December, 2020 (9.00 a.m.) and ended on Sunday, 3rd January, 2021 (5.00 p.m.).
 - e. The Members of the Company as on “cut off” date i.e. 27th November, 2020 were entitled to vote on the resolution stated in the Notice of the Postal Ballot.

- f. During the period from 4th December, 2020 to 3rd January, 2021 (i.e. total duration of 30 days), 14 Equity shareholders in respect of 56,70,00,000 Equity shares exercised their voting right through E-voting platform of CDSL.
- g. In view of MCA circulars and SEBI circular, the Postal Ballot process was conducted through E-voting only i.e. without dispatch and receipt of physical ballot papers through post.
- h. The votes casted on E-voting were subsequently unblocked by me on 4th January, 2020 (after end of voting period) in the presence of two witnesses, whose names are mentioned below, who are not in the employment of the Company and electronic ballots were diligently scrutinized by me.
- | Sr. No. | Name & Address of witnesses | Signature of witnesses |
|---------|---|---|
| 01. | Sunil A. Mulchandani
58, Sudama Homes, B/h Nandigram Society, Nana Chiloda, Ahmedabad |  |
| 02. | Saloni Hurkat
Sanyam 11/B, Ajanta Society, Behind LIC Society, Nr. Upasana Circle, Wadhwan, Surendranagar. |  |
- i. The electronic ballots (E-voting) were reconciled with the records maintained by the Company / Registrar and Transfer Agents of the Company and the authorization lodged by the respective Equity shareholders.
- j. Thereafter, the details of members, who have voted “For”, “Against” the resolution proposed for Postal Ballot, were prepared based on report generated from the e-voting website of CDSL.
6. Based on the scrutiny of the Electronic Ballots, the result of the E-voting on the Resolution is as under:

Particulars	Number of Ballots	Number of Shares
Total E-ballots received	14	5670000
Total Postal Ballots received	Nil	Nil
Total Ballots received	14	5670000
Less: Invalid ballot	Nil	Nil
Total Valid Ballots	14	5670000
Less: Unutilised votes	Nil	Nil
Total Valid used Ballots	14	5670000

Special Resolution for migration of listing of equity shares from BSE SME Platform of Main Board of BSE.

(i) Voted **in favour** of the resolution:

Particulars	Number of members voted	Number of votes cast by them	Values of shares voted	% of total number of valid votes cast
Through E-voting	14	5670000	56700000	100%
Through Postal Ballot	Nil	Nil	Nil	Nil
Total	14	5670000	56700000	100%

(ii) Voted **against** the resolution:

Particulars	Number of members voted	Number of votes cast by them	Values of shares voted	% of total number of valid votes cast
Through E-voting	Nil	Nil	Nil	Nil
Through Postal Ballot	Nil	Nil	Nil	Nil
Total	Nil	Nil	Nil	Nil

(iii) **Invalid** Votes:

Particulars	Number of members/ballots	Number of votes
Through E-voting	Nil	Nil
Through Postal Ballot	Nil	Nil
Total	Nil	Nil

Pursuant to the proviso of Section 277 of the SEBI (Issue of Capital and Disclosure Requirements), Regulations, 2018, it is provided that the Special Resolution shall be acted upon if and only if votes cast by shareholders other than promoters in favour of the proposal amount to atleast two times the number of votes cast other than promoters against the proposal i.e. the Promoters shall abstain from voting.

In view of this, for the purpose of determining requisite majority for this resolution, I have further checked and scrutinized as to whether any of the promoters have participated in the voting process for this item of business. After such checking and scrutiny, I have excluded the voting of all the promoters as per the available list of promoters.

Hence, the final voting result, as per SEBI (ICDR) Regulations, 2018 is as under:

(i) Voted **in favour** of the resolution:

Particulars	Number of members voted	Number of votes cast by them	Values of shares voted	% of total number of valid votes cast
Through E-voting	12	456000	4560000	100%
Through Postal Ballot	Nil	Nil	Nil	Nil
Total	12	456000	4560000	100%

(ii) Voted **against** the resolution:

Particulars	Number of members voted	Number of votes cast by them	Values of shares voted	% of total number of valid votes cast
Through E-voting	Nil	Nil	Nil	Nil
Through Postal Ballot	Nil	Nil	Nil	Nil
Total	Nil	Nil	Nil	Nil

(iii) **Invalid Votes:**

Particulars	Number of members/ballots	Number of votes
Through E-voting	Nil	Nil
Through Postal Ballot	Nil	Nil
Total	Nil	Nil

Thus, the percentage of votes in favour and against the resolution is as under:

	Based on Number of Shares	Based on Value of Shares
In favour	100%	100%
Against	Nil	Nil

You may accordingly declare the result of voting conducted through Postal Ballot with E-voting facility.

5. A compact disk (CD) / Excel Sheets and other supportive documents containing list of equity shareholders who voted “For”, “Against” and those equity share holders whose votes which were declared “Invalid” for the resolution and also the resolutions/authorization received from corporate shareholders etc. together with the original postal ballots, will be returned separately, in due course.

Thanking you,

Place: Ahmedabad

Date: 4th January, 2020

Yours faithfully,



Signature of the Scrutinizer

[CS MANOJ HURKAT]

FCS – 4287, CP -2574

PRACTISING COMPANY SECRETARY

Countersigned by:

For, SHUBHAM POLYSPIN LIMITED

Chairman/Authorised Signatory