



VINAYAK POLYCRON

ANNUAL REPORT 2012-2013

4th ANNUAL REPORT

2012-2013



VINAYAK POLYCRON INTERNATIONAL LIMITED



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**BOARD OF DIRECTORS****Mr. Bhanwar Lal Baid**

Chairman

CA Bharat Baid

Managing Director

CA Vikram Baid

Executive Director

CA Laxmipat Nahata

Independent and Non Executive Director

Mr. M.S. Bhandari

Independent and Non Executive Director

Mr. Tej Kumar Dugar

Independent and Non Executive Director

Statutory Auditors**A. Natani & Co.**

Chartered Accountants

Room No. 7, Samod Tower

II Floor, Dadu Marg

S.C.Road, Jaipur

BOARD COMMITTEES**Audit Committee**

Mr. Laxmipat Nahata

Mr. M.S. Bhandari

Mr. Vikram Baid

Remuneration Committee

Mr. M.S. Bhandari

Mr. Laxmipat Nahata

Mr. Vikram Baid

**Shareholders'/Investor's
Grievance Committee**

Mr. M.S. Bhandari

Mr. Laxmipat Nahata

Mr. Vikram Baid

Corporate Advisors

V.M. & Associates

Company Secretaries

403, Royal World

Sansar Chandra Road

Jaipur- 302 001

Registrar and Share Transfer Agent**M/s MAS Services Limited**

T-34 2nd Floor, Okhla Industrial Area, Phase-II, New Delhi-110020,

Phone No: 91-11-26387281-13,

Fax:-91-11-26387384, Email: -info@masserv.com

Principal Banker

Indian Overseas Bank

Registered and Correspondence Office

312, Navjeevan Complex, 29, Station Road, Jaipur- 302 006 (Rajasthan), India

Phone No: 91-141-2377007, Fax:-91-141-2378830,

Email: - investor@vinayakpolycon.com

Website: - www.vinayakpolycon.com

Works :

Unit-1

16, Pandur Village, Kayarambedu Post, Via Guduvanchery Dist.Kanchipuram - 603202,
TAMIL NADU.

**FINANCIAL HIGHLIGHTS****For the Year Ended 31st March :**

OF THE YEAR ENDED 31st MARCH 2013				
Particulars	2010	2011	(Amount Rs. In Lac)	
			2012	2013
PROFIT & APPROPRIATIONS				
Sale & Other Income	0.00	1388.03	1357.76	1821.13
Profit Before Depreciation & Tax	0.00	116.52	105.58	108.64
Depreciation	0.00	109.80	95.33	100.78
Profit before Tax	0.00	6.72	10.25	7.86
Taxation	0.00	1.55	3.18	2.94
Profit After Tax	0.00	5.17	7.07	4.92
Dividend	0.00	0.00	0.00	0.00
Earning per Share	0.00	0.17	0.23	0.16
ASSETS EMPLOYED				
Fixed Assets Gross	0.00	950.27	998.75	1058.29
Depreciation	0.00	289.02	383.35	484.13
Net	0.00	661.25	615.40	574.16
Capital work in progress	0.00	0.00	1.50	0.00
Investment	0.00	0.00	0.00	0.00
Net Current Assets	4.47	478.93	102.07	125.91
Miscellaneous Expenditure	2.11	4.64	3.70	2.78
	6.58	1144.82	722.67	702.85
FINANCED BY				
Equity Shares	5.00	308.12	308.13	308.13
Reserve & Surplus	0.00	35.58	42.64	47.56
Loan Funds	1.58	771.51	342.13	318.90
Deferred Tax Liability	0.00	29.61	29.77	28.26
	6.58	1144.82	722.67	702.85



NOTICE OF ANNUAL GENERAL MEETING

NOTICE is hereby given that the Fourth Annual General Meeting (AGM) of Vinayak Polycron International Limited will be held on Saturday, the 07th day of September, 2013 at 03.00 P.M. at "Parmanand Hall", Ashok Marg, C-Scheme, Jaipur-302001, to transact the following business:

ORDINARY BUSINESS :

1. To receive, consider and adopt the Audited Balance Sheet as at 31st March, 2013, Profit and Loss Account for the year ended on that date, and the Reports of the Directors and the Auditors thereon.
2. To appoint a Director in place of Shri Laxmipat Bahadursingh Nahata, Director who retires by rotation and being eligible, offers himself for re-appointment.
3. To reappoint M/s A. Natani & Co., Chartered Accountants, as auditors to hold office from the conclusion of this Annual general meeting until the Conclusion of next Annual General Meeting and to authorise Board of Directors to fix their remuneration.

SPECIAL BUSINESS :

4. To consider and if thought fit to pass with or without modifications the following resolution as an Ordinary Resolution:

"RESOLVED THAT M/s V. M. & Associates, Company Secretaries, Jaipur be and is hereby appointed as Company Secretary for the issuance of Compliance Certificate under Section 383A of the Companies Act, 1956 and to hold office from the conclusion of this Annual General Meeting until the conclusion of the next Annual General Meeting at a remuneration to be fixed by the Board of Directors of the Company in consultation with the said firm.

RESOLVED FURTHER THAT the Board be and is hereby authorized to take all such steps as may be necessary, proper or expedient to give effect to this Resolution."

BY ORDER OF THE BOARD

PLACE: JAIPUR
DATE: 30.05.2013

Sd/-
BHARAT KUMAR BAID
MANAGING DIRECTOR

NOTES :

1. A MEMBER ENTITLED TO ATTEND AND VOTE IS ENTITLED TO APPOINT A PROXY TO ATTEND AND VOTE INSTEAD OF HIMSELF AND THE PROXY NEED NOT BE A MEMBER OF THE COMPANY.

2. The proxy form should be lodged with the Company at its Registered Office at least 48 hours before the commencement of the Meeting.
3. Corporate members are requested to send a duly certified true copy of the board resolution authorizing their representatives to attend and vote at the Annual General Meeting.
4. In terms of Articles of Association of the Company, read with Section 256 of the Companies Act, 1956, Mr. Laxmipat Bahadursingh Nahata, Director of the Company, retire by rotation at the ensuing Meeting and being eligible, offers himself for reappointment. The Board of Directors of the Company commends this re-appointment.
5. A brief resume of Mr. Laxmipat Bahadursingh Nahata and other information required under clause 49(VI) (A) of the listing agreement is included in the Report of Corporate Governance.
6. The registers of the members and share transfer books of the company shall remain closed from Friday, 06th September, 2013 to Saturday, 07th September, 2013 (Both days inclusive) and for payment of dividend (if any) for the Financial Year 2012-2013.
7. Members are informed that in case of joint holders attending the Meeting, only such Joint holder who is higher in the order of the names will be entitled to vote.
8. All documents referred to in the Notice are open for inspection at the Registered Office of the Company during office hours on all days except Sunday & public holidays between 11.00 a.m. and 1.00 p.m. up to the date of Annual General Meeting.
9. For convenience of members, an attendance slip is annexed to the proxy form. Members are requested to affix their signature at the space provided and hand over the attendance slips at the place of meeting. The proxy of a member should mark on the attendance slip as 'proxy'.
10. Explanatory Statement for Item No 4 pursuant to Section 173(2) of the Companies Act, 1956 is enclosed herewith.
11. M/s MAS Services Limited, having its Registered Office at T-34, 2nd Floor, Okhla Industrial Area, Phase - II, New Delhi is appointed as the Company's Registrar & Transfer Agent.
12. Members desiring any information on the accounts at the Annual General Meeting are requested to write to the Company at least 7 days in advance, so as to enable the Company to keep the information ready.

13. Members are requested to bring the following with them at the Annual General Meeting:

- Copy of the Annual Report.
- Duly filled Attendance Slip for attending the meeting and the same should be deposited at the entrance of the Meeting Hall.
- Depository account number (Client ID), if any, for easier identification and recording of attendance at the meeting.

14. The Register of Directors' shareholding maintained under Section 307 of the Companies Act, 1956 will be available for inspection by the members at the Annual General Meeting.

15. The Register of Contracts maintained under Section 301 of the Companies Act, 1956 will be available for inspection by the members at the registered office of the Company.

16. The Securities and Exchange Board of India (SEBI) has mandated the submission of Permanent Account Number (PAN) by every participant in securities market. Members holding shares in electronic form are, therefore, requested to submit the PAN to their Depository Participants with whom they are maintaining their demat accounts. Members holding shares in physical form can submit their PAN details to the Company / Registrars and Transfer Agents.

17. Members are informed that Ministry of Corporate Affairs has taken a "Green Initiative in Corporate Governance" (Circular No. 17/2011 dated 21.04.2011 and Circular No. 18/2011 dated 29.04.2011) allowing paperless compliances by companies through electronic mode. Companies are now permitted to send various notices/ documents to its shareholders through electronic mode to the registered e-mail addresses of shareholders. Your company has also decided to be a part of this initiative and request the shareholders to send/update their email id's in the company's record. This initiative will enable better flow of the information required to be disseminated to the members and save the environment by saving the paper. We seek your whole-hearted support for this initiative.

Explanatory statement pursuant to Section 173(2) of the Companies Act, 1956

ITEM NO. 4

As per the requirements of Section 383A of the Companies Act, 1956 and (Companies Compliance) Certificate Rules, 2001 the Company has to obtain a certificate from Company Secretary in practice certifying that legal and procedural requirement under the Companies Act have been duly complied with by the Company. For which appointment of M/s V. M. & Associates, Company Secretaries, Jaipur for conducting and

issuing Compliance Certificate u/s 383A of Companies Act, 1956 is sought.

None of the directors are interested in the said resolution.

The Directors recommend the above ordinary resolution stated at item No. 4 for your approval.

BY ORDER OF THE BOARD

**PLACE: JAIPUR
DATE: 30.05.2013**

**Sd/-
BHARAT KUMAR BAID
MANAGING DIRECTOR**

ANNEXURE TO THE NOTICE of AGM

Details of Director seeking re - appointment at the Annual General Meeting as per Clause 49 of the Listing Agreement Information pursuant to Clause 49 of the Listing Agreement with the Stock Exchanges in respect of the Directors who are proposed to be appointed/re-appointed at the ensuing Annual General Meeting to be held on 07th September, 2013:

Details of Shri Laxmipat Bahadursingh Nahata, Director of the Company are as follows:

Name of the Director	Laxmipat Bahadursingh Nahata
Date of Birth	06.11.1953
Date of Appointment	14.09.2011
Designation	Independent & Non Executive Director
Qualification(s)	B.Com., FCA
Name of the Companies in which directorship held as on 31.03.2013	None.
Member of the Committee of Board of other companies	None
No. of Shares held in the Company	NIL

BY ORDER OF THE BOARD

**PLACE: JAIPUR
DATE: 30.05.2013**

**Sd/-
BHARAT KUMAR BAID
MANAGING DIRECTOR**



DIRECTORS' REPORT

To,
The members,
Vinayak Polycon International Limited

Your Directors are pleased to present their Fourth Annual Report on the business and operations of the Company alongwith the Audited Statement of Accounts for the financial year ended on 31st March, 2013.

FINANCIAL RESULTS :

The financial performance of the company for the year ended March 31, 2013 is summarized below :

Amount Rs. In lacs

Particulars	2012-2013	2011-2012
Income	1821.14	1357.76
Expenses	1813.28	1347.51
Profit for the year before Tax	7.86	10.25
Tax expenses	2.94	3.19
Net Profit after Tax	4.92	7.06

PERFORMANCE REVIEW

The company is engaged in the manufacture of Plastic containers and closures. The net receipts from Operations during the year under review were Rs. 1821.14 Lacs as against Rs. 1357.76 Lacs in the previous year. The profit/(Loss) after tax is Rs. 4.92 Lacs as against Rs. 7.06 Lacs in the previous year. The income from operations decreased by Rs. 2.14 Lacs during the year under review.

DIVIDEND :

In view of future working and expansion projects of the Company, your Directors do not recommend payment of any dividend for the year ended 31st March, 2013.

RESERVES

The Board has not transferred any amount to General Reserve. Whole profit of the Company during the year i.e. Rs. 4.92 Lacs transferred to the profit & loss a/c for the F.Y. 2012-13, in compliance with the relevant provisions of the Companies Act, 1956.

CAPITAL STRUCTURE

During the F.Y. 2012-13 there is no change in capital structure of the Company and paid up share capital of the Company stands at Rs. 3,08,12,950/-.

DIRECTORS

Shri Laxmipat Bahadursingh Nahata, Director, retires by rotation in terms of provisions of Companies Act, 1956 and Articles of Association of the Company at the ensuing Annual General

Meeting and being eligible, offers himself for re-appointment. The retiring Director does not hold any shares in the company. A brief resume and other information required under clause 49 of the listing agreement is included in the Notice of Annual General Meeting. The Board recommends his re-appointment.

MANAGEMENT DISCUSSION AND ANALYSIS

INDUSTRY STRUCTURE & DEVELOPMENT

During the period under review there is significant increase in the use of plastic including PET Containers throughout the country. Clear Visibility of packed product in primary and secondary packaging has gained importance. The buyer wants to clearly see the inner contents before buying and wants the container to be unbreakable, child safe and durable. This led to great increase in manufacturing of plastic wares in the country especially PET.

Your company is on its way to capitalize on this trend, through improved production of plastic products and through alliances with the suppliers who have specific expertise in the related field. At the same time, there was a significant shortage of Power in Tamil Nadu, where the factory is located, which led to higher dependence on Self-generated Electricity. This situation is bound to improve once the installed plant in Kudankulam in Tamil Nadu starts.

OPPORTUNITY

The consumption of plastic is increasing at the rapid speed as it is easy and convenient to use and can easily be recycled. It paves a path to the companies to make new development for the better positioning in the market. The ability to see the contents off the shelves before buying in a transparent container is always preferred over others.

Vinayak Polycon International Limited continuously striving to increase its production and aims to provide better quality products to its consumers along with making strong position in domestic market.

THREATS

- Temporary decline in the economic activity
- Increase competition in the plastic industry due to entry of new players
- Introduction of new technologies
- Introduction of new taxes
- Introduction of new Tax Free Zones in India
- Any unfavourable change in Government Policies may affect the profitability of the company.
- Threat of substitutes.
- Shortage of Electricity in Tamil Nadu

As the company is engaged in only one segment of plastic items there is no need to elaborate segment wise performance.

**OUTLOOK**

The Outlook of your Company is promising, in light of its refreshed mission and vision and clear strategic framework. Vinayak Polycon International Limited leadership team and employees at all levels are in line with the strategy and working towards making it a success. The Company's product development team has developed an exciting range of plastic items which will fuel our growth in future.

RISKS AND CONCERNS

Competition is increasing day-by-day in all fields of business. Similarly, there is competition in plastic industries too. The company is facing various risks and obstacles which includes inflation risk, credit risk, interest rate risk, non-availability of raw-material, high prices etc.

In order to overcome such situations company is fully aware towards the preparation of appropriate programs, adoption of suitable policies and to take corrective and precautionary measures for safeguarding the company's market position and further to strengthening it.

ADEQUACY OF INTERNAL CONTROL SYSTEM

The Company has a comprehensive system of internal controls to safeguard the company's assets against loss from unauthorized use and ensure proper authorization of financial transactions.

The company has an exhaustive budgetary control system to monitor all expenditures against approved budget on an ongoing basis.

The Company has an internal audit function, which is empowered to examine the adequacy and compliance with policies, plans and statutory requirement.

The management duly considers and take appropriate actions on the recommendation made by Audit Committee of the Board of Directors.

HUMAN RESOURCES DEVELOPMENT/TRAINING

Human Resources are the important asset of any enterprise. Success of any enterprise mainly depends on its human power. In this regard, your company has made best efforts to employ good professionals, staff members, labourers etc.

Vinayak Polycon International Limited is keen to retain best of the human resources by effective training and development programs, by providing reasonable wages and salary by creating good working environment etc. Company's human resources are mobilized in order to strengthen the company internally to face future challenges. Your company is providing a "state of art" working environment to the employees with a view to optimize their performance.

EMPLOYMENT PROFILE & INDUSTRIAL RELATIONS:

As on 31st March, 2013, the Company employed a total of 60 employees of which 12 were Officers and 48 belong to non-

executive cadre.

Vinayak Polycon International Ltd. believes in building teams across the business and functions with the aim to share knowledge and experience. Cross functional teams work with clear objectives to solve the issues and create value for the company. The company fosters open dialogue among the employees with the brief that the people, who communicate continuously and openly, build trust and mutual respect.

CAUTIONARY STATEMENT

Statement in this management discussion and analysis describing the Company's objectives, projections, estimate, and expectations may be forward looking statement within the meaning of applicable laws and regulations.

Actual results would differ substantially or materially from those expressed or implied. Important factors that could affect the company's operations include domestic and international economic conditions in the industry, significant changes in political and economic environment in India, changes in government regulations, tax regimes, litigation, labour relation and other statutes.

LISTING OF SECURITIES

The Equity shares of the company are listed with the Bombay Stock Exchange Limited w.e.f. 28.08.2012.

PUBLIC DEPOSITS

During the year the company has not accepted or renewed any deposits U/S 58A of the Companies Act, 1956, from public.

DEMAT CONNECTIVITY WITH NSDL AND CDSL :

The Company has a demat connectivity with National Securities Depository Limited (NSDL) and Central Depository Services (India) Limited (CDSL), M/s MAS Services Limited, New Delhi is the appointed Connectivity Agent for dematerialization of securities of the company with NSDL and CDSL.

CORPORATE GOVERNANCE :

The Company has complied with all the mandatory requirements of Corporate Governance specified by Securities & Exchange Board of India (SEBI) through Clause 49 of the Listing Agreement. As required by the said clause, a separate Report on Corporate Governance, forms part of the Annual Report of the Company. A certificate from M/s A. Natani & Co., Chartered Accountants, Jaipur Auditor of the Company, confirming compliance of conditions of Corporate Governance is annexed with this report.

AUDITORS & AUDITORS' REPORT :

The Statutory Auditors of the Company M/s A. Natani & Co., Chartered Accountants, Jaipur, retires at the ensuing Annual General Meeting and have confirmed their eligibility and willingness to accept office of Auditors, if reappointed. The



appointment of Statutory Auditors of the company shall be from the conclusion of the forthcoming Annual General Meeting till the conclusion of the next Annual General Meeting of the Company. Your Directors recommend their reappointment.

The Auditor's report is self-explanatory and does not call for any explanation.

COMPLIANCE CERTIFICATE :

As per the requirements of Section 383A of the Companies Act, 1956 and Companies (Compliance Certificate) Rules, 2001, the Company has obtained a Certificate from M/s V. M. & Associates, Company Secretaries in Whole-time Practice, confirming that the Company has complied with the provisions of the Companies Act, 1956 and a copy of the Compliance Certificate is annexed to this report.

The appointment of M/s V. M. & Associates, Company Secretaries in Whole-time Practice, is also sought, for the year 2013-14, given in the notice.

PARTICULARS OF EMPLOYEES :

Information in accordance with Sub-Section (2A) of Section 217 of the Companies Act, 1956, as amended read with Companies (Particulars of Employees) Rules, 1975 is NIL.

CONSERVATION OF ENERGY, RESEARCH AND DEVELOPMENT, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO

The particulars regarding foreign exchange earnings and expenditure were Nil. The other particulars relating to conservation of energy; research and developmental activities and technological absorption are not applicable. However, the management has taken all the necessary steps to conserve the resources to the extent possible.

DIRECTORS'S RESPONSIBILITY STATEMENT :

Pursuant to the requirements under Section 217(2AA) of the Companies Act, 1956, with respect to Directors' Responsibility Statement, it is hereby confirmed that:

- (i) in preparation of the accounts for the financial year ended 31st March 2013, the applicable accounting standards have been followed along with proper explanations relating to material departures;
- (ii) the Directors have selected such accounting policies and applied them consistently and made judgment and estimates that were reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of the financial year and of the profit or loss of the Company for the year under review;

(iii) the Directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 1956 for safeguarding the assets of the Company and for the preventing and detecting fraud and other irregularities;

(iv) the Directors have prepared the accounts for the financial year ended on 31st March, 2013 on a 'going concern basis'.

EQUAL OPPORTUNITY TO ALL THE EMPLOYEES

The Company has always provided a congenial atmosphere for work to all sections of the society. Your Company is committed to respect universal human rights. To that end, the Company practices and seeks to work with business associates who believe and promote these standards. The Company is committed to provide equal opportunities at all levels, safe and healthy workplaces and protecting human health and environment. The Company provides opportunities to all its employees to improve their skills and capabilities. The Company's commitment extends to its neighboring communities to improve their educational, cultural, economic and social well-being. Your Company is an equal opportunity employer and does not discriminate on the grounds of race, religion, nationality, ethnic origin, colour, gender, age, citizenship, sexual orientation, marital status or any disability not affecting the functional requirements of the position held.

CODE FOR PREVENTION OF INSIDER TRADING PRACTICES

In compliance with the SEBI Regulations on prevention of insider trading, the Company has formulated and implemented a comprehensive Code of Conduct for Prevention of Insider Trading by its management and employees. The code lays down guidelines advising them on procedures to be followed and disclosures to be made while dealing with shares of Company.

ACKNOWLEDGEMENT :

Your Directors would like to express their appreciation for assistance and co-operation received from the Bankers, Central & State government, Local Authorities, Client, Vendors, Advisors, Consultants, Associates at all levels for their continued guidance and support. Your Directors also wish to place on record their deep sense of appreciation for their commitment, dedication and hard work put in by every member of the our Company.

To them goes the credit for the Company's achievement and to you, our shareholders we are deeply grateful for the confidence and the faith that you have always reposed in us.

PLACE: JAIPUR
DATE: 30.05.2013

FOR AND ON BEHALF OF THE BOARD

Sd/-
BHARAT KUMAR BAID
MANAGING DIRECTOR

Sd/-
VIKRAM BAID
EXECUTIVE DIRECTOR



COMPLIANCE CERTIFICATE

CIN: - L25209RJ2009PLC030620
Nominal Capital: - Rs. 32,500,000/-

To,
The Members,
Vinayak Polycon International Limited
312, Navjeevan Complex,
29, Station Road, JAIPUR - 302006

We have examined the registers, records, books and papers of VINAYAK POLYCON INTERNATIONAL LIMITED ("the Company") as required to be maintained under the Companies Act, 1956 ("the Act") and the rules made thereunder and also the provisions contained in the Memorandum and Articles of Association of the Company for the financial year ended on 31st March, 2013. In our opinion and to the best of our information and according to the examinations carried out by us and explanations furnished to us by the Company, its officers, we certify that in respect of the aforesaid financial year:

1. the Company has kept and maintained all registers as stated in Annexure 'A' to this certificate, as per the provisions and the rules made thereunder and all entries therein have been duly recorded.
2. the Company has duly filed the forms as stated in Annexure 'B' to this certificate, with the Registrar of Companies, through Ministry of Corporate Affairs within time as prescribed under the Act and the rules made thereunder. However, no forms were required to be filed with Regional Director, Central Government, Company Law Board or other authorities.
3. the Board of Directors duly met 5 (Five) times on 26.05.2012, 19.07.2012, 08.10.2012, 15.10.2012 and 14.02.2013 in respect of which meeting proper notices were given and the proceedings were properly recorded and signed in the Minutes Book maintained for the purpose. However, no resolution was passed by circulation.
4. the Company closed its Register of Members from Friday, 31st August, 2012 to Saturday, 1st September, 2012 (both days inclusive) and necessary compliance of Section 154 of the act has been made.
5. the Annual General Meeting for the financial year ended on 31st March, 2012 was held on Saturday, 1st September, 2012 after giving due notice to the members of the Company and the resolutions passed thereat were duly recorded in Minutes Book maintained for the purpose.
6. the company has advanced loans to firms and Companies referred in the Section 295 of the Act, after generally complying with the provisions of the Act.
7. the Company has made necessary entries in the register maintained under Section 301 of the Act.
8. the Company has:-
 - i. delivered all the certificates on lodgement thereof for transfer in accordance with the provisions of the Act
 - ii. duly complied with the requirements of Section 217 of

the Act.

9. the Board of Directors of the Company is duly constituted. There was no appointment of Additional Directors, Alternate Directors and Director to fill casual vacancy during the financial year.
10. the Directors have disclosed their interest in other firms / Companies to the Board of Directors pursuant to the provisions of the Act and the rules made thereunder.
11. the Company has complied with the provisions of Section 58A and 58AA read with Rule 2(b)(iv) of the Companies (Acceptance of Deposit) Rules, 1975 to the extent of unsecured loans taken from Body Corporates, being exempted.
12. the company has generally deposited both employee's and employer's contribution to provident fund with prescribed authorities pursuant to Section 418 of the Act.
13. other paras of the Companies (Compliance Certificate) Rules, 2001 are either NIL or NOT APPLICABLE for the current period.

PLACE: JAIPUR
DATE: 30.05.2013

FOR V. M. & ASSOCIATES
COMPANY SECRETARIES

Sd/-

CS V. M. DAVE
PARTNER

Certificate of Practice No: 452

Annexure A

Registers as maintained by the Company :

1.	Register of Charges	u/s 143
2.	Register of Members	u/s 150
3.	Minutes Book of Board and General Meeting	u/s 193
4.	Register of contracts in which directors are interested	u/s 301
5.	Register of Directors	u/s 303
6.	Register of Directors' Shareholding	u/s 307
7.	Register of Investments	u/s 372A
8.	Register of Application for & Allotment of Shares	-----

Annexure B

Forms and Returns as filed by the Company with the Registrar of Companies, through Ministry of Corporate Affairs during the financial year ending on 31st March, 2013:

1. E-Form No. 66 along with Compliance Certificate filed u/s 383A for the financial year ended 31.03.2012, filed in time on 13.09.2012.
2. E-Form No. 20B alongwith Annual Return under Schedule V, for the Annual General Meeting held on 01.09.2012, filed in time on 28.09.2012.
3. E-Form No. 23AC & 23ACA (XBRL) along with Balance Sheet and Profit & Loss Account for the year ended on 31.03.2012, filed u/s 220 in time on 15.12.2012.