

HO/SRSL/SEC 26th May, 2022

Regd. & H.O.: 27-A, First Floor, Meera Nagar, Housing Board Colony, Udaipur (Raj.)-313001; M.No. 9314879380

Email: cs@srsl.in; Website: www.srsl.in

CIN: L24302RJ1979PLC001948

(Mills: Village<sup>-</sup> Udaipura, Simalwara Road, Dungarpur<sup>-</sup> 314001)

The BSE Ltd., Phiroze Jeejobhoy Towers, Dalal Street, Mumbai-400 001

Ref: Shree Rajasthan Syntex Ltd.,

(Scrip Code: 503837)

Sub: Reg.24(A) - Annual Secretarial Compliance Report

Dear Sir / Ma'am,

With reference to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we are enclosing herewith the Annual Secretarial Compliance Report of the Company issued by M/s V.M. & Associates, Practising Company Secretaries, for the financial year ended 31st March, 2022.

You are requested to take note of the same.

Thanking You,

Yours Faithfully,

FOR: SHREE RAJASTHAN SYNTEX LTD.,

PRINKLE TALESAR

(COMPANY SECRETAR

AND COMPLIANCE OFFICER)

Encl: As above



Telephone: 0141-2370954 Email: cs.vmanda@gmail.com

## Secretarial Compliance Report of Shree Rajasthan Syntex Ltd For the year ended March 31, 2022

We M/s V. M. & Associates, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Shree Rajasthan Syntex Ltd ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2022 ("Review Period") in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not applicable to the listed entity during the Review Period);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not applicable to the listed entity during the Review Period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (repealed w.e.f. 13<sup>th</sup> August, 2021) (Not applicable to the listed entity during the Review Period);
- (f) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (notified on 13<sup>th</sup> August, 2021) (Not applicable to the listed entity during the Review Period);
- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (repealed w.e.f. 9<sup>th</sup> August, 2021) (Not applicable to the listed entity during the Review Period);





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- (h) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (notified on 9<sup>th</sup> August, 2021) (Not applicable to the listed entity during the Review Period);
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 (Not applicable to the listed entity during the Review Period);
- (j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (k) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, we hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of those records.
- (c) No action has been taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under and the fines levied however, the listed entity has received an order for waiver of penalties imposed by BSE Limited (Stock Exchange) for the alleged non compliances under Regulation 17(1), 18(1), 19(1) and 19(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;.



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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31st March, 2022	Actions taken by the listed entity, if any	Comments of the Practicing Company secretary on the actions taken by the listed entity.
1.	Intimation to Stock Exchange for Board Meeting held on August 24, 2020 was made on August 19, 2020 with 1 day delay.  BSE Limited has levied penalty of Rs.11,800/-(Basic Rs. 10,000 + GST Rs. 1,800) on the Listed Entity for this non-compliance.	NIL	Company has now duly intimated the stock exchange within the prescribed timeline of all the intimations, submissions or disclosures that are required to be submitted / filed to the exchange from time to time.	It is expected that the Company shall continue to comply with the said Regulation.

Place: Jaipur

Date: May 25, 2022

UDIN: F003355D000382791

For V. M. & Associates Company Secretaries (ICSI Unique Code P1984RJ039200) PR 581 / 2019

> CS Manoj Maheshwari Partner

Membership no.: FCS 3355

CP No.: 1971