



**SHREE
RAJASTHAN SYNTEX LTD.**

HO/SRSL/SEC
24th June, 2021

Regd. & H.O. : 27-A, First Floor, Meera Nagar,
Housing Board Colony,
Udaipur (Raj.)-313001;
Ph. No. (0294) 2440334;
Email: cs@srsll.in; Website: www.srsll.in
CIN: L24302RJ1979PLC001948

To,
BSE Limited,
25th Floor, P.J. 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, 2021.

You are requested to take note of the same.

Thanking You,

Yours faithfully,

FOR: SHREE RAJASTHAN SYNTEX LTD.,

**PRINKLE TALESARA
(COMPANY SECRETARY
AND COMPLIANCE OFFICER)**



Encl: As above



Secretarial Compliance Report
of
Shree Rajasthan Syntex Ltd
For the year ended March 31, 2021

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, 2021 ("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 **(Not applicable to the listed entity during the Review Period)**;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not applicable to the listed entity during the Review Period)**;
- (g) 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)**;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;





- (i) 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 except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	<p>Regulation 29 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</p> <p>Intimation regarding Financial Results to be discussed at the meeting of Board of Directors shall be given at least five days in advance (excluding the date of the intimation and date of the meeting), and such intimation shall include the date of such meeting of board of directors.</p>	<p>Intimation to Stock Exchange for Board Meeting held on August 24, 2020 was made on August 19, 2020 with 1 day delay.</p> <p>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.</p>	<p>Intimation to Stock Exchange for Board Meeting held on August 24, 2020 was made on August 19, 2020 with 1 day delay.</p> <p>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.</p>

The Listed Entity has received a notice from BSE Limited regarding non-compliance of Regulation 17(1), 18(1) and 19(1)/(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 with regard to delay in composition of the Board and its committees. The Listed Entity has filed its reply to the above notice giving reasons and justifications for a valid compliance. The matter is pending before the waiver committee of BSE Limited.

- (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.





V.M. & ASSOCIATES

COMPANY SECRETARIES

403, Royal World
Sansar Chandra Road, Jaipur- 1

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

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **NOT APPLICABLE** being no observation in previous report.

Place: Jaipur

Date: June 24, 2021

UDIN: F003355C000505802

For V. M. & Associates

Company Secretaries

(ICSI Unique Code P1984RJ039200)

PR 581 / 2019



CS Manoj Maheshwari

Partner

Membership no.: FCS 3355

C P No.: 1971