

COMSYN/BSE/2020-21

Date: 07th July, 2020Online Filing at: listing.bseindia.com

To,
The General Manager,
DCS-CRD
BSE Limited
PhirozeJeejeebhoy Towers
Dalal Street Mumbai- 400001(MH)

BSE Scrip ID: COMSYN BSE Scrip Code: 539986

Subject: Submission of Annual Secretarial Compliance Report for the year ended on 31st March, 2020.

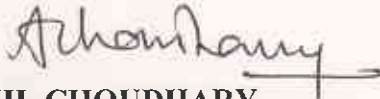
Dear Sir,

With reference to the terms of Clause 3(b)(iii) of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we hereby submit the Annual Secretarial Compliance Report for the year ended on 31st March, 2020.

You are requested to please take on record the above said document for your reference and further needful.

Thanking You,
Yours Faithfully,

FOR, COMMERCIAL SYN BAGS LTD.



ANIL CHOUDHARY
CHAIRMAN & MANAGING DIRECTOR
DIN: 00017913



Encl. As above

**SECRETARIAL COMPLIANCE REPORT**

(Pursuant to Regulation 24A of the SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/1 27/2019 dated 8th February, 2019)

OF**COMMERCIAL SYN BAGS LIMITED****for the year ended 31.03.2020**

- I, **CS Ishan Jain**, proprietor of M/s Ishan Jain & Co., Company Secretaries have examined:
- all the documents and records made available to us and explanation provided **Commercial Syn Bags Limited**. (CIN: L25202MP1984PLC002669) ("the Listed Entity")
 - the filings/ submissions made by the listed entity to the BSE Ltd., - www.bseindia.com
 - website of the company, www.comsyn.com
 - any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **31st March, 2020** ("Review Period") in respect of compliance with the provisions of:

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

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

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018; (*Not applicable*)
- SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- SEBI (Buyback of Securities) Regulations 2018; (*Not applicable*)
- SEBI (Share Based Employee Benefits) Regulations, 2014; (*Not applicable*)
- SEBI (Issue and Listing of Debt Securities) Regulations, 2008; (*Not applicable*)
- SEBI (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (*Not applicable*)
- SEBI (Prohibition of Insider Trading) Regulations, 2015;
- circulars/guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period:

- The company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder as applicable to it, 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.	As per Regulation 5 of SEBI (Prohibition of Insider Trading) Regulations, 2015 the promoter who intends to acquire/dispose shares of the company are required to submit Trading Plan to the Compliance Officer of the company.	Non submission of Trading Plan as required under Regulation 5.	Pravi Investments LLP a person acting in concert with Super Sack Pvt Ltd (One of the Promoter of the company) has acquired 3,28,929 equity shares of Rs. 10/- each about 2.778% and Super Sack Pvt. Ltd. (being the promoter) has



			also acquired 2,02,356 equity shares of Rs. 10/- about 1.20% of the total paid up share capital of the Company during the year 2019-20 without complying with the Regulation 5 of SEBI (PIT) Regulations, 2015 relating to submission of Trading Plans and matters related thereto. However, pre clearance approval was given by the compliance Officer under SEBI (PIT) Regulations, 2015.
--	--	--	---

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) The following are the details of actions 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 thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
=====None=====				

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
=====N.A.=====				

Date: 04th July, 2020
Place: Indore



For, ISHAN JAIN & CO.
COMPANY SECRETARIES
FRN No. I2014MP1139600

CS ISHAN JAIN
PROPRIETOR
CP NO. 13032
FCS 9978

UDIN: F009978B000415262