

Ref No: SEC/NSE/BSE/2021-22  
May 30,2022

**The Manager, Capital Market (Listing)  
National Stock Exchange of India Ltd.**  
Exchange Plaza, 5<sup>th</sup> Floor,  
Plot No : C/1, G Block,  
Bandra Kurla Complex,  
Bandra (E), Mumbai-400 051

**The Corporate Relationship Dept.  
BSE Limited**  
1<sup>st</sup> Floor, New Trading Ring,  
Rotunda Building, P.J. Towers,  
Dalal Street, Mumbai-400 001

**Stock Code: Equity – SPTL**

**Stock Code: Equity 540653**

Dear Sir/Madam,

**Sub.: Annual Secretarial Compliance Report for the Financial Year ended on 31<sup>st</sup> March,2022**

Pursuant to SEBI circular no. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, please find enclosed herewith Annual Secretarial Compliance Report for the Financial Year ended on 31<sup>st</sup> March, 2022 issued by M/s. Chirag Shah and Associates, Practicing Company Secretary, Ahmedabad.

Kindly take the same on record.

Thanking You.

Yours Faithfully,

**For Sintex Plastics Technology Limited**

  
Manan Bhavsar  
**Company Secretary**



Encl: As above

**SINTEX PLASTICS TECHNOLOGY LIMITED**

(Formerly known as Neev Educare Limited)

Regd. Office : In the premises of Sintex-BAPL Ltd., Near Seven Garmala, Kalol (N.G.)-382 721

Phone : +91-2764-253500 E-mail : info@sintex-plastics.com

CIN: L74120GJ2015PLC084071

**Investor Relationship Cell:**

7<sup>th</sup> Floor, Abhijit Building-I, Mithakhali Six Roads,  
Ellisbridge, Ahmedabad-380006, Gujarat.

Ph.: (079) 26420045, 6358855979

E-mail : info@sintex-plastics.com

[www.sintex-plastics.com](http://www.sintex-plastics.com)





## **CHIRAG SHAH & ASSOCIATES**

Company Secretaries

1213, Ganesh Glory, Nr. Jagatpur Crossing,

Besides Ganesh Genesis,

Off. S.G. Highway, Ahmedabad - 382 481.

Ph.: 079-40020304, 6358790040/41/42

E-mail : chi118\_min@yahoo.com

### **SECRETARIAL COMPLIANCE REPORT OF SINTEX PLASTICS TECHNOLOGY LIMITED**

**FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

To,

**Sintex Plastics Technology Limited**

In the premises of Sintex-BAPL Limited,

Near Seven Garnala,

Kalol, Gandhi Nagar - 382721

We, Chirag Shah and Associates, Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and the explanation provided by Sintex Plastics Technology Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the Stock Exchanges,
- (c) website of the listed entity i.e. <https://www.sintexplastics.com/>.
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31<sup>st</sup> March, 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, and guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, and 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: -

- (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;
- (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) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 **(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 and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the Company 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 Company during the Review Period);**

(h) (The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 and the Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 **(Not Applicable to the listed entity during the Review Period);**

(i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and

(j) the Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

and circulars/ guidelines issued thereunder;

Based on the above examination, 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.	Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Non-submission for the quarter ended December 2021	The Benpos of the Company was blocked by the NSDL and CDSL, as a result, the company has filed a shareholding pattern with 33 days delay.



2.	Regulation 76 of SEBI (Depositories & Participants) Regulation 2018	Non-submission of Reconciliation of Share Capital Audit Report.	The Benpos of the Company was blocked by the NSDL and CDSL, as a result, the company has filed a Share Capital Audit with 24 days delay.
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(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/our 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 was 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.
1.	National Stock Exchange of India Limited ("NSE") and BSE Limited ("BSE")	Regulation 31 – Delay in the submission of shareholding pattern for the quarter ended December 2021	A fine of Rs. 2000/- per day for each day for the period of 22 <sup>nd</sup> January to 12 <sup>th</sup> February aggregating to Rs. 44,000/- plus applicable GST was levied by each of NSE and BSE each on the Company.	The Benpos of the Company was blocked by the NSDL and CDSL, as a result, the company has filed a shareholding pattern with 33 days delay and after that Company has requested for waiver of fine.
2.	National Stock Exchange of India Limited ("NSE") and BSE Limited ("BSE")	Regulation 6(1) - Non-compliance with the requirement to appoint a qualified company secretary as the compliance	A fine of Rs. 1000/- per day for each day for 92 days aggregating to Rs. 92,000/- plus applicable GST was levied by each of NSE and	Mr. Manan Bhavasar was appointed as a Company Secretary & Compliance Officer since 17/07/2018. The company is in compliance with Regulation 6(1)



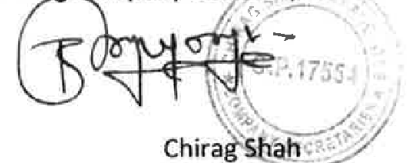
		officer for the quarter ended December 2021	BSE each on the Company.	during the quarter ended December 2021.
3.	National Stock Exchange of India Limited ("NSE") and BSE Limited ("BSE")	Regulation 7(1) - Non-compliance with requirement to appoint share transfer agent for the quarter ended December 2021	A fine of Rs. 1000/- per day for each day for 92 days aggregating to Rs. 92,000/- plus applicable GST was levied by each of NSE and BSE each on the Company.	Bigshare Services Pvt. Ltd was appointed as a share transfer agent. The company is in compliance with Regulation 7(1) during the quarter ended December 2021.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: - **There was no observation made in the previous report for the financial year ended on March 31, 2021.**

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions are taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity

**I, further, report that there was no event of appointment/ re-appointment/ resignation of statutory auditor of the Company during the review period. In this regard, I report that the Company has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.**

For, Chirag Shah and Associates  
Practising Company Secretary



Chirag Shah  
Partner

Place: Ahmedabad  
Date: 28/05/2022

Membership No. FCS 5545  
C P No. 3498  
UDIN : F011283D000420472