

**Date: 31<sup>st</sup> May2022**

To,  
BSE Limited,  
P.J. Towers,  
Dalal Street,  
Mumbai – 400001

Ref.: Company Code: 539982

Dear Sir / Madam,

**Sub:** Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022

In terms of Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find attached herewith Annual Secretarial Compliance report for Advance Syntex Limited for the year ended 31st March, 2022 issued by Devesh R Desai, Company Secretaries.

This is for your record.

Thanking you,

**FOR ADVANCE SYNTEX LIMITED**



**BHAVAN VORA**  
**MANAGING DIRECTOR**  
**DIN: 01613974**



**Devesh R. DESAI**  
**COMPANY SECRETARY**

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40-D, Arpita Park, Near ESI Hospital,  
Gotri Road, Vadodara-390 021.  
(M) 9879533717

Devesh R. Desai  
M.Com. LL.B. ACS  
deveshrdesai2002@rediffmail.com  
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**To,**  
**The Board of Directors,**  
**Advance Syntex Limited,**  
**CIN No. L17119GJ1990PLC014406**  
**233/2 & 238/2, GIDC, Por,**  
**Ramangamdi, Vadodara-391243.**

**Sub.: Annual Secretarial Compliance Report for the Financial Year 2021-2022**

**Dear Sir,**

I have been engaged by **ADVANCE SYNTEX LIMITED** (hereinafter referred to as the 'Company') [CIN: (L17119GJ1990PLC014406) whose equity shares are listed on BSE Limited, to conduct an audit in terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the Management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

My audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022 is enclosed.



**Devesh R. Desai**  
**Practicing Company Secretary**  
**ACS#11332 CP#7484**  
**Place: Vadodara**  
**Date: 31<sup>ST</sup> May, 2022**  
**UDIN No. A011332D000439980**  
**Peer Review Certificate No. : 2043/2022**



**Devesh R. DESAI**  
**COMPANY SECRETARY**

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Devesh R. Desai  
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deveshrdesai2002@rediffmail.com  
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**Secretarial compliance report of Advance Syntex Limited**  
**for the year ended 31<sup>st</sup> March, 2022**

I Devesh R. Desai, Practicing Company Secretaries have examined:

(a) all the documents and records made available to us and explanation provided by **Advance Syntex Limited (CIN No. L17119GJ1990PLC014406)** (“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 31<sup>st</sup> March, 2022 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 thereunder; and

(b) 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:-

(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; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable.

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder (hereinafter as “Insider Trading regulations”);

(i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulation, 2009. There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(j) Securities and Exchange Board of India (Depositories and Participants) Regulation, 2018.

Circulars/guidelines issued thereunder and based on the above examination, I 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 29(2)/29(3) - Furnishing prior intimation about the meeting of the Board of Directors	BSE imposed Fine of Rs. 11,800/-	The Company has submitted letter for waiver of fine with proper reason to BSE

			through email dated 25/01/2021 & 24/04/2021. As of date, no reply was received from BSE.
2.	Regulation 33	BSE imposed Fine of Rs. 5900/- for late submission of un-audited financial results for the quarter ended December, 2021.	Fine imposed by the stock exchange which the Company had paid on 31/03/2022

(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.

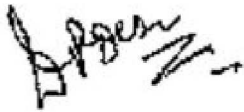
(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations! remarks of the Practicing Company Secretary, if any.</b>
1.	Regulation 29(2)/29(3) - Furnishing prior intimation about the meeting of the Board of Directors	Regulation 29(2)/29(3) - Furnishing prior intimation about the meeting of the Board of Directors	BSE imposed Fine of Rs. 11,800/-	The Company has submitted letter for waiver of fine with proper reason to BSE through email dated 25/01/2021 & 24/04/2021. As of date, no reply was received from BSE
2.	Regulation 33	Regulation 33	BSE imposed	Fine imposed by

			Fine of Rs. 5900/- for late submission of un-audited financial results for the quarter ended December, 2021.	the stock exchange which the Company had paid on 31/03/2022
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(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 <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
		NOT APPLICABLE		



**Devesh R. Desai**  
**Practicing Company Secretary**  
**ACS#11332 CP#7484**

**Place: Vadodara**  
**Date: 31<sup>st</sup> May, 2022**  
**UDIN No. A011332D000439980**  
**Peer Review Certificate No. : 2043/2022**

