

30<sup>th</sup> June, 2021

The Manager,  
Dept of Corp. Services,  
Bombay Stock Exchange Limited,  
P. J. Towers, Dalal Street,  
Mumbai- 400 001.

**Scrip No: 500192**

**Sub: Submission of Annual Compliance Report**

**Respected Sir or Madam,**

With reference to the above captioned subject matter and pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 read with SEBI circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February 2019, enclosed herewith find the Annual Secretarial Compliance Report for the Financial Year 2020-21

**Kindly take the same on your & oblige**

Thanking You

Yours faithfully,  
For PRAG BOSIMI SYNTHETICS LIMITED



Madhu P. Dharewa  
Company Secretary  
A31733



**AMIT MUNDRA FCS, LLB**

---

**PRACTICING COMPANY SECRETARY**

**Office No. 3D, 801, Building Dheeraj Upvan, Sidharth Nagar, Borivali East, Mumbai -400066.**

**Email id: [amitmundra.cs@gmail.com](mailto:amitmundra.cs@gmail.com), M. No. 9137516317/9833981230.**

---

**ANNUAL SECRETARIAL COMPLIANCE REPORT  
FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2021**

To,  
The Board of Directors,  
Prag Bosimi Synthetics Limited  
House No.19, Ambikagiri Nagar, Milan Path,  
R.G.Barua Road, Guwahati,  
Assam - 781 024.

I, Mr. Amit Mundra, Practising Company Secretary, having office at Office No. 3D, 801, Building Dheeraj Upvan, Sidharth Nagar, Borivali East, Mumbai 400066 have examined:

- a) all the documents and records made available to us, either physically or by way of email in view of the prevailing pandemic situation of COVID -19 and explanation provided by Prag Bosimi Synthetics Limited (hereinafter referred to as “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, 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 thereunder, have been examined, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereof;
- 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;



## AMIT MUNDRA FCS, LLB

---

### PRACTICING COMPANY SECRETARY

Office No. 3D, 801, Building Dheeraj Upvan, Sidharth Nagar, Borivali East, Mumbai -400066.

Email id: [amitmundra.cs@gmail.com](mailto:amitmundra.cs@gmail.com), M. No. 9137516317/9833981230.

---

- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not applicable to the 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 (Depositories and Participant Regulation), 2018;
- j) The 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;

The Compliance by the Company of applicable financial laws, like Direct and Indirect tax laws, has not been reviewed in this Audit since the same have been subject to review by statutory financial audit and other designated professionals.

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, 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 there under, 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.	NIL	NIL	NIL

(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 my/our examination of those records.



## AMIT MUNDRA FCS, LLB

### PRACTICING COMPANY SECRETARY

Office No. 3D, 801, Building Dheeraj Upvan, Sidharth Nagar, Borivali East, Mumbai -400066.

Email id: [amitmundra.cs@gmail.com](mailto:amitmundra.cs@gmail.com), M. No. 9137516317/9833981230.

(c) The listed entity has been maintaining its website which is <http://www.pragbosimi.com> and its operational under the provisions of the Regulations and circulars/ guidelines issued there under insofar as it appears from my/our examination of those records.

(e) 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 there under:

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.
1.	BSE Ltd	One day delay in filing of Shareholding Pattern	Fine imposed of Rs 2360/-	The fine has been paid by the company

(f) 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 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NA	NA	NA	NA	NA

Date: 30.06.2021

Place: Mumbai

AMIT MUNDRA  
Practicing Company Secretary  
FCS No.: F7933  
C P No.:16182  
UDIN: F007933C000553379

**\*Disclaimer Note:**

During this challenging time of COVID 19 outbreak this report has been undertaken to the best of my capability based on of e verification of scans, soft copies , information, confirmations, records and documents made available to us by the management.