

Date: 30th June, 2021

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 31st March, 2021

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, 2021 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

40-D, Arpita Park, Near ESI Hospital,
Gotri Road, Vadodara-390 021.
(M) 9879533717 (R) 2324248

Devesh R. Desai
M.Com. LL.B. ACS
deveshrdesai2002@rediffmail.com

**Secretarial compliance report of Advance Syntex Limited for the year ended 31st
March, 2021**

I 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 31st March, 2021 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;

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 34 – Annual Report submission of the Annual Report within the period prescribed under this regulation	BSE Imposed Fine of Rs. 4720/- (F.Y ended March 2020) Late submission	The company's letter / mail requesting waiver for fine imposed for late / non-compliance of Regulation 34. The BSE approved the waiver of fine vide email dated 21/04/2021.

2.	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.
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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.

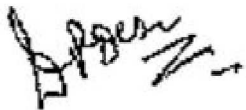
(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/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

Sr. No.	Action 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.	Regulation 34	Non-submission of the Annual Report within the period prescribed under this regulation	Fine of Rs. 4720/- (F.Y ended March 2020) Late submission	The company's letter / mail requesting waiver for fine imposed for late / non-compliance of Regulation 34. The BSE approved the waiver of fine vide email dated 21/04/2021.

2.	Regulation 29(2)/29(3)	Delay in furnishing prior intimation about the meeting of the board of directors	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.
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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 endeth <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: 30th June, 2021
UDIN No. A011332C000548627

