

Ref No: SEC/NSE/BSE/2023-24

May 30, 2023

The Manager, Capital Market (Listing) National Stock Exchange of India Ltd.

Exchange Plaza, 5th Floor, Plot No: C/1, G Block, Bandra Kurla Complex, Bandra (E), Mumbai-400 051 The Corporate Relationship Dept. **BSE Limited**

1st 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 31st March,2023

Pursuant to SEBI circular no. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed herewith Annual Secretarial Compliance Report for the Financial Year ended on 31st March, 2023 issued by M/s. Chirag Shah and Associates, Practicing Company Secretary, Ahmedabad.

You are requested to kindly take the above information on record.

Thanking You,

For Sintex Plastics Technology Limited

(A Company under Corporate Insolvency Resolution Process by NCLT, Ahmedabad bench order dated 21st February 2023)

ANKIT SANCHIHER B00515A36E88370044551DB98D49 128831B037A0C71E8574, cn=ANKIT SANCHIHER Date: 2023.05.30 20.22:15+05'30'

Digitally signed by ANKIT
SANCHIHER
DN: c=IN, o=Personal,
postalCode=313301, st=Rajasthan,
serialNumber=FFBEE41DE74096E9

Ankit Sanchiher Company Secretary

Investor Relationship Cell:

7th Floor, Abhijit Building-I, Mithakhali Six Roads, Ellisbridge, Ahmedabad-380006, Gujarat. Ph.: (079) 26420045, 6358855979

E-mail: info@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 31st March, 2023

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Sintex Plastics Technology Limited (hereinafter referred as "the listed entity" or "the Company"), having its Registered Office at In the premises of Sintex-BAPL Limited, Near Seven Garnala, Kalol, Gandhi Nagar - 382721. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2023, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

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

- (a) all the documents and records made available to us and explanation provided by the listed entity,
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity i.e. www.sintexplasticstech.com
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **31**st **March, 2023** ("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 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 ("SEBI LODR 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
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; Not Applicable
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; Not Applicable
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) the Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

and circulars/guidelines issued thereunder;

We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:



The Listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

Requirement on Circul- ar no. taken by ar no. the quarter. Amount Amount SEBI (Listing Regulations and 31 nor Obligations and 31 nor Obligations and 31 nor Obligations, Columnary and Regulations, and a pattern Limited Company has the quarter. Shareholdin of India representation and the quarter. Shareholdin of Company has the quarter. BSE for Gonpany has the quarter. As per for September. As per for September. <t< th=""><th>Sr.</th><th>Compliance</th><th>Regulati-</th><th>Deviations</th><th>Action</th><th>Type of action</th><th>Details of</th><th>Fine</th><th>Observatio</th><th>Observatio Management Remarks</th><th>Remarks</th></t<>	Sr.	Compliance	Regulati-	Deviations	Action	Type of action	Details of	Fine	Observatio	Observatio Management Remarks	Remarks
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ations, capital from NSE for Quarter by NSE and audit audit report for		Participants)		share	("NSE")	non-compliance	report for	were issued	capital	by the NSDL	
audit June quarter ended June BSE. report for		Regulations,		capital				by NSE and	audit	and CDSL,	
		2018		audit		June quarter	ended June	BSE.	report for	due to non-	



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payment of Annual custody fees. as a result, the company has not filed shareholdin g pattern	The said delay was Due to some technical issues, the filings made by the Company was taken on record in the respective compliance tab post completion of the prescribed timeframe.
Quarter ended June 2022 and Quarter ended September 2022	Delay in The said submission delay was of Due to some Disclosure technical on Related issues, the Party filings made Transaction by the s for the Company quarter was taken ended on record in September the compliance tab post completion of the prescribed timeframe.
	Rs 5000/- per day for 34 days of noncomplia nce aggregating to Rs. 200600/- including GST by each stock exchange
2022 and Quarter ended September 2022	fine Non Rs 5000/- 600/- submission of per day for ST by Disclosure on 34 days of stock Related Party noncomplia Transactions nce aggregating to Rs. 200600/- including GST by each stock exchange
	Stock Rs. 2,00,600/- submission of per day for Exchange including GST by Disclosure on 34 days of of India each stock Related Party noncomplia Limited exchange Transactions nce ("NSE") and BSE Limited ("BSE") GST by each stock exchange
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report	Non Nationa submissio Stock n of Exchang Disclosur of India e on Limited Related ("NSE") Party and BSE Transacti Limited ons ("BSE")
	(Listing Regulation ons and 23(9) re ments) ons,
	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
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(a) The listed entity has taken the following actions to comply with the observations made in previous reports:

Remarks	
Manage- ment response	The Benpos of the Company was blocked by the NSDL as a result, the company has filed a shareholdin g pattern with 33 days delay and after that Company has
Observations / Remarks of the Practicing Company Secretary	Delay in submission of shareholding pattern for the quarter ended December 2021
of Fine Amount Observations / Remarks of the Practicing Company Secretary	A fine of Rs. 2000/- per day for each day for the period of 22nd January to 12th February aggregating to Rs. 214,000/- plus applicable GST was levied by each of NSE and BSE each on the
Details of Violation	Delay In the submission of shareholding pattern for the quarter ended December 2021
Type of action	Imposed a fine Rs. 2,14,000/ - plus applicabl e GST by each stock exchange
	National Stock Exchange of India Limited ("NSE") and BSE Limited ("BSE")
Deviat-ions	Non- Submission of Shareholdi ng pattern
Regulati- on/Circul -ar No.	Regulatio n 31
Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
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waiver of fine.	Mr. Manan Bhavasar was appointed as a Company Secretary & Compliance Officer since 17/07/2018. The compliance with Regulation 6(1) during the quarter ended December 2021	Bigshare Services Pvt. Ltd was appointed as a share transfer agent. The company is
	Mr. Manan Bhavasar was appointed as a Company Secretary & Compliance Officer since 17/07/2018. So, there was no violation or non- Compliance of the said regulation.	Bigshare Services Pvt. Ltd was appointed as a share transfer agent. The
Company.	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.	A fine of Rs. 1000/- per day for each day for 92 days aggregating to Rs. 92,000/- plus
	Non- compliance with the requirement to appoint a qualified company secretary as the compliance officer for the quarter ended December 2021	Non- compliance with requirement to appoint share transfer agent for the
	a fine Rs. 92,000/- plus applicabl e GST by each stock exchange	Imposed a fine Rs. 92,000/- plus applicabl e GST by each stock
	National Stock Exchange of India Limited ("NSE") and BSE Limited ("BSE")	National Stock Exchange of India Limited ("NSE") and BSE Limited
	Non- compliance with the requireme nt to appoint a qualified company secretary as the compliance	Appointme nt of share transfer agent
	Regulatio n 6(1)	Regulatio n 7(1)
	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
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Ë	compliance	with	Regulation	non- 7(1)	during the	quarter	ended	December	2021.
compliance.		So, there was with	no violation		Compliance of during the	the said	regulation.		
applicable	GST was	levied by	each of NSE	and BSE each or	on the	Company.			
quarter	ended	December	2021						
exchange quarter									
("BSE")	9								

(b) The listed entity has not taken any actions to comply with the following observations made in previous reports: Not Applicable



II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019: There was no event of appointment by casual vacancy/ resignation of statutory auditor of the Company during the review period.

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	Compliances with the following conditions while appo	inting/re-appointir	ng an auditor
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	No Such instance
	ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	NA	No Such instance
	iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	No Such instance
2.	Other conditions relating to resignation of statutory a	uditor	
	 i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: 	, NA	No Such instance
	a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.	NA	No Such instance
	b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has	NA	No Such instance



	informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.		
	c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.	NA	No Such instance
ů s	ii. Disclaimer in case of non-receipt of information:		
,	The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	NA	No Such instance
3.	The listed entity / its material subsidiary has obtained	NA	No Such
	information from the Auditor upon resignation, in the		instance
8.0	format as specified in Annexure- A in SEBI Circular		
	CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.		

III. I/We hereby report that, during the Review Period the compliance status of the listed entity is appended below:

Sr.	Particulars	Compliance	Observations/Remarks
No.		status	
		(Yes/No/NA)	
1.	Secretarial Standards:		
	The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	NA
2	Adoption and timely updation of the		
	 Policies: All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	Yes	NA



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3	 Maintenance and disclosures on Website: The Listed entity is maintaining a functional website Timely dissemination of the documents /information under a separate section on the website Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website 	Yes	NA
4	Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	The application made by Financial Creditor has been admitted under the provision of Corporate insolvency Resolution Process under the IBC Code 2016 and board is under Suspension Mode.
5	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes	Both the material subsidiaries i.e. M/s. Sintex Prefab and Infra Limited and M/s. Sintex-BAPL Limited are admitted under the provision of Corporate insolvency Resolution Process under the IBC Code 2016.
6	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	NA
7	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	NA
			E.P. 7354

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(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained. Pisclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder. Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015. Actions taken by SEBI or Stock Exchange(s), if any: action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein. Additional Non-compliances, if any: additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	8	Related Party Transactions:		
(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained. 9 Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule IIII of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder. 10 Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015. 11 Actions taken by SEBI or Stock Exchange(s), if any: action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein. 12 Additional Non-compliance, if any: additional non-compliance observed for all	17 H	(a) The listed entity has obtained prior approval of Audit Committee for all	Yes	
Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder. Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015. Actions taken by SEBI or Stock Exchange(s), if any: action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein. Additional Non-compliances, if any: additional non-compliance observed for all Yes NA		(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has	NA	and Explanation provided to us no Related party transactions were entered without prior
The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder. 10 Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015. 11 Actions taken by SEBI or Stock Exchange(s), if any: action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein. 12 Additional Non-compliances, if any: additional non-compliance observed for all	9	Disclosure of events or information:		тецияте аррготан
The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015. Actions taken by SEBI or Stock Exchange(s), if any: action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein. Additional Non-compliances, if any: additional non-compliance observed for all Yes NA		The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015	Yes	NA
Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015. Actions taken by SEBI or Stock Exchange(s), if any: action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein. Additional Non-compliances, if any: additional non-compliance observed for all	10	Prohibition of Insider Trading:		As per the Information
if any: action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein. 12 Additional Non-compliances, if any: additional non-compliance observed for all		Regulation 3(5) & 3(6) SEBI (Prohibition of	No	to us from the company that they are in process of
action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein. 12 Additional Non-compliances, if any: additional non-compliance observed for all Yes NA	11	Actions taken by SEBI or Stock Exchange(s),		
additional non-compliance observed for all Yes NA		action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein.	Yes	As mentioned in point I
	12			
			Yes	NA



Assumptions & Limitation of scope and Review:

Place: Ahmedabad Date: 30/05/2023

- 1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
- 2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- 3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
- 4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For, Chirag Shah and Associates
Practising Company Secretary

Raimeen Maradiya

Partner

Membership No. FCS 11283

C P No. 17554

UDIN: F011283E000430801 Peer review no.: 704/2020