

COMSYN/BSE/2021-22

Date: 10<sup>th</sup> June, 2021

Online filing at [www.listing.bseindia.com](http://www.listing.bseindia.com)

To,  
The General Manager  
DCS-CRD  
BSE Ltd.  
Phiroze Jeejeebhoy Towers  
Dalal Street, Fort  
MUMBAI - 400001

**BSE Scrip ID: COMSYN    BSE Scrip Code: 539986**

**Subject: : Submission of Annual Secretarial Compliance Report for the year ended on 31<sup>st</sup> March, 2021.**

Dear Sir/Madam,

With reference to the terms of clause 3(b)(iii) of the SEBI Circular No. CIR/CFD/CMD 1/27/2019 dated 8<sup>th</sup> February, 2019, we hereby submit the Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2021.

Further, the Annual Secretarial Compliance Report will also be filed in XBRL mode within the stipulated time period.

You are requested to please take on record the above said document for your reference and further needful

Thanking you.

Yours Faithfully,

**For, COMMERCIAL SYN BAGS LIMITED**



**CS SANDEEP PATEL  
COMPANY SECRETARY  
&  
COMPLIANCE OFFICER**

Encl: a/a



**Commercial Syn Bags Limited**

CIN : L25202MP1984PLC002669

Registered Office : Commercial House, 3-4, Jaora Compound, M.Y.H. Road, INDORE - 452 001, M.P. INDIA

Ph. +91-731-2704007, 4279525 Fax : +91-731-2704130 E-mail : mails@comsyn.com, Visit at : www.comsyn.com

**SECRETARIAL COMPLIANCE REPORT**

(Pursuant to Regulation 24A of the SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019)

**OF****COMMERCIAL SYN BAGS LIMITED****for the year ended 31.03.2021**

I, **CS Ishan Jain**, proprietor of M/s Ishan Jain & Co., Company Secretaries have examined:

- all the documents and records made available to us and explanation provided **Commercial Syn Bags Limited** (CIN: L25202MP1984PLC002669) ("the Listed Entity")
- the filings/ submissions made by the listed entity to the BSE Ltd., - [www.bseindia.com](http://www.bseindia.com)
- website of the company, [www.comsyn.com](http://www.comsyn.com)
- 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:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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, as amended from time to time and applicable, have been examined, include: -

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
  - SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;
  - SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
  - SEBI (Buyback of Securities) Regulations 2018;
  - SEBI (Share Based Employee Benefits) Regulations, 2014;
  - SEBI (Issue and Listing of Debt Securities) Regulations, 2008;
  - SEBI (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
  - SEBI (Prohibition of Insider Trading) Regulations, 2015;
  - circulars/guidelines issued thereunder;
- and based on the above examination,

I hereby report that, during the Review Period:

- The listed entity has complied with the provisions of the above Regulations, circulars, notifications and guidelines issued thereunder and as applicable to it, [the Regulations mentioned above under (d) to (g) are not applicable to the company during the review period] 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.	As per Regulation 5 of SEBI (Prohibition of Insider Trading) Regulations, 2015 the	- Non submission of Trading Plan as required under Regulation 5.	- Pravi Investments LLP a person acting in concert with Super Sack Pvt. Ltd. (One of the Promoter of the



	<p>promoter who intends to acquire/dispose shares of the company are required to submit Trading Plan to the Compliance Officer / BSE.</p>		<p>company) has acquired 72,763 equity shares of Rs. 10/- each, about 0.62%; and</p> <ul style="list-style-type: none"> <li>- Super Sack Pvt. Ltd. (being the promoter) has also acquired 93,820 equity shares of Rs. 10/- about 0.80% of the total paid up share capital of the Company during the year 2020-21 without complying with the Regulation 5 of SEBI (PIT) Regulations, 2015 relating to submission of Trading Plans and matters related thereto;</li> <li>- The following Promoters of the Company have also purchased the shares of the Company: - <ul style="list-style-type: none"> <li>i. Ravindra Kumar Choudhary 91,600 shares (0.78%)</li> <li>ii. Hemlata Choudhary 25,000 shares (0.21%)</li> <li>iii. Anil Choudhary 50,075 shares (0.42%)</li> <li>iv. Ashay Choudhary 25,000 shares (0.21%)</li> <li>v. Pramal Choudhary HUF 20,000 shares (0.17%)</li> </ul> </li> </ul> <p>However, pre clearance approval was given to the compliance Officer under SEBI (PIT) Regulations, 2015.</p>
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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 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.
None				

(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	Actions taken by the listed entity, if any	Comments of the practicing Company Secretary on the actions taken by the listed entity



1	Pravi Investments LLP person acting in concert with Super Sack Pvt. Ltd. (One of the Promoter of the company) has acquired 3,28,929 equity shares of Rs. 10/- each about 2.778% and Super Sack Pvt. Ltd. (being the promoter) has also acquired 2,02,356 equity shares of Rs. 10/- about 1.20% of the total paid up share capital of the Company during the year 2019-20 without complying with the Regulation 5 of SEBI (PIT) Regulations, 2015 relating to submission of Trading Plans and matters related thereto. However, pre clearance approval was given by the compliance Officer under SEBI (PIT) Regulations, 2015.	31 <sup>st</sup> March, 2020	- No action was taken, being the company assumes that the acquisitions made by the Promoter and Group is not a trading activity as it is a long term investment and hence requirement for submission of the Trading Plan is not applicable.	The Promoters and person acting in concert with them, have not taken any action regarding submission of the trading plan, moreover, they have done the similar acquisition of the shares in the year 2020-21 also without submission of the trading plan to Compliance Officer/BSE as reported in the para (a) above.
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Date: 09<sup>th</sup> June, 2021  
Place: Indore



For, ISHAN JAIN & CO.  
COMPANY SECRETARIES  
FRN No. S2021MP802300

CS ISHAN JAIN  
PROPRIETOR  
CP NO. 13032  
FCS 9978  
UDIN: F009978C000436690