



Himanshu S K Gupta & Associates Company Secretaries

Secretarial compliance report of
SHREE RAJASTHAN SYNTEX LTD.

Regd. Office: 27-A, First Floor, Meera Nagar,
Housing Board Colony, Udaipur, Rajasthan, India, 313001
for the year ended 31.03.2024

I Himanshu Gupta, Proprietor of M/s Himanshu S.K. Gupta & Associates, Practicing Company Secretary holding CP No. 22596, have examined:

- a) all the records and documents made available to us and explanation provided by **SHREE RAJASTHAN SYNTEX LTD.** ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity (www.srsl.in)
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended March 31st, 2024 ("Review Period") in respect of compliance with the provisions of:
 - i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - ii) 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;
- 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 to the company during the audit period);**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the company during the audit period);**
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable to the company during the audit period);**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment Regulations), 2021;





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and circulars/ guidelines issued thereunder;

and based on the above examination, I/We 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: -

S l o	Compliance Requirement Regulations / circulars /guidelines including specific clause)	Regulation / Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Reg. 24A(2): Submission of secretarial compliance report under Reg. 24A(2) is required under PDF & XBRL mode both	Reg. 24A(2) of SEBI (LODR) Regulations 2015	Company has filed the said report in pdf however has failed to submit in XBRL mode.	NA	NA	Partial: Company has filed the said report in pdf however has failed to submit in XBRL mode.	NA	Partial Compliance: Company has filed the said report in pdf format in a timely manner however has failed to submit in XBRL mode.	Inadvertently missed the said filing, will ensure the complete compliance in future.	NA

(b) The listed entity has taken the following actions to comply with the observations made in previous reports

S r o	Observations/Remarks Of the Practicing Company Secretary in the Previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	The Company maintains a Structured Digital Database but details of unpublished price sensitive information shared with the Auditors was initially not captured in it.	31 ST March 2023	Regulation 3(5) SEBI (Prohibition of Insider Trading) Regulations, 2015 The board of directors of Listed Entity shall ensure that a structured digital	Action was taken by BSE in the form of marking as SDD Non-compliant and virtual inspection was	Company made the entries and now ensuring to the required compliance on time.	Company is in proper compliance of the same now.





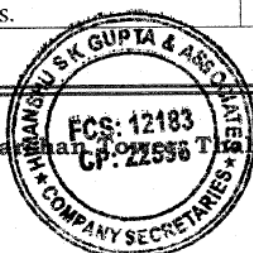
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		database is maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared	also conducted later on by BSE		
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I/We hereby report that, during the Review Period the compliance status of the listed entity with the following requirements;

Sr. No.	Particulars	Compliance status (Yes/No/ NA)	Observations/ Remarks by PCS*
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	The company has complied with the Secretarial Standards (SS) issued by Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118 (10) of the Companies Act, 2013 and mandatorily applicable.
2.	<u>Adoption and timely updation of the Policies:</u> - 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 has been reviewed & timely updated as per the regulations/circulars/ guidelines issued by SEBI	Yes	The company has adopted and timely updated all the applicable policies under SEBI Regulations. All the policies are in conformity with the SEBI Regulations and have been reviewed & updated.
3.	<u>Maintenance and disclosures on Website:</u> -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	The listed company has maintained a functional website and has timely disseminated the information.
4.	<u>Disqualification of Director:</u> None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity	Yes	None of the director(s) of the company is disqualified under Section 164 of Companies Act, 2013
5.	<u>Details related to subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies.	NA	The listed entity does not have any subsidiaries or material subsidiaries.





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	(b) Disclosure requirement of material as well as other subsidiaries.		
6	<u>Preservation of Documents:</u> 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	The listed entity is preserving, maintaining and disposing records as prescribed under SEBI Regulations.
7	<u>Performance Evaluation:</u> 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	The Company has conducted performance evaluation of the Board, Independent Directors and the Committees
8	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/rejected by the Audit committee.	Yes NA	Company has obtained prior approval of Audit Committee for all the related party transactions. Self-Explanatory
9	<u>Disclosure of events or information:</u> 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.	Yes	The listed entity has provided all the required disclosures under Regulation 30 read with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.
10	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015, i.e. compliance with requirement of maintaining Structured Digital Database.	Yes	The company has maintained a Structured Digital Database for handling the UPSI and recorded the UPSI in a timely manner.
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No 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 (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	NO	Self-Explanatory
12	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(is) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by	NA	NA





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	listed entities.		
13	Additional non-compliances, if any: Additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.	No	Self-Explanatory

Assumptions & Limitation of scope and Review:

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.

Date: May 30, 2024

Place: Ahmedabad

For, Himanshu S K Gupta & Associates
Practicing Company Secretary



Himanshu Surendrakumar Gupta
Proprietor

FCS: 12183, CP No.: 22596
Peer Review No.: 1943/2022
UDIN: F012183F000500220