

KONARK SYNTHETIC LIMITED

Reg. Off. Mittal Industrial Estate, Bldg. No 7, Ground Floor, Sakinaka, Andheri East, Mumbai 400059
Tel No. 022-40896300 Fax: 022-40896322 E mail: info@konarkgroup.co.in, Website: www.konarkgroup.co.in
CIN: L17200MH1984PLC033451

3rd July, 2020

To,
The Manager (CRD)
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400 001.

Dear Sir,

Scrip Code: 514128

Sub.: Annual Secretarial Compliance Report for the Year Ended March 31, 2020 Ref: SEBI Circular No. CIR/CFD/CMD1/ 2712019 dated 8th February, 2019.

Pursuant to SEBI Circular No.CIR/CFD/CMD1/27/2019 dated February 8, 2019, we attach herewith Annual Secretarial Compliance Report issued by Practicing Company Secretary for the year ended March 31, 2020.

Kindly take the same on record.

Thanking you,

Yours faithfully,

For **Konark Synthetic Limited**

Sd/-

Mehnuddin Khan
Company Secretary & Compliance Officer
Membership No. A40156

: As above

**Signed copy could not be submitted due to work from home policy for COVID-19*



KRS AND CO.

Practicing Company Secretaries

ANNUAL SECRETARIAL COMPLIANCE REPORT

(Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Konark Synthetic Limited ("the Company") For The Year Ended 31st March, 2020

I have been appointed by the Company to submit Annual Secretarial Compliance Report, pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the Financial Year Ended 31st March, 2020.

I, have examined:

- (a) all the documents and records made available to me and explanation provided by the Company and its officers,
- (b) the filings/ submissions made by the Company to BSE Limited from time to time;
- (c) website of the Company; and
- (d) such other documents/ filings, made by the Company, which has been relied upon to make this certification

for the year ended 31st March, 2020 ("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;
- (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 during the review period)**



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable during the Review Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable 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 during the Review Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder by the concerned authority from time to time;

Based on the above examination, I hereby report that, during the Review Period:

- a) The Company 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 Practicing Company Secretary, if any
NIL	NIL	NIL	NIL

- b) The Company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my examination of those records.
- c) The following are the details of actions taken against the Company/ 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	Observations /Remarks Practicing Company Secretary, if any
NIL	NIL	NIL	NIL	NIL

(d) The Company has taken the following actions to comply with the observations made in previous reports ;

Sr.No.	Observations by Practicing Company Secretary in previous reports	Observations made in Secretarial Compliance Report for the year ended 31st March, 2019	Action taken by the Company, if any	Comments of the Practicing Company Secretary on the action taken, if any
1.	The Company delayed the submission of annual audited consolidated financial results for the year ended 31 st March, 2018 beyond a period of Sixty Days.	Since the financials of Subsidiary Company was not ready, the Company adopted and submitted the annual audited Consolidated financial results on 11 th June 2018.	Due care is taken since then by the Company in consultation with the auditors of the Subsidiary Company to get its financials audited on time.	N.A.



Note: This report is based on information, documents, material etc seen/verified/made available to me. However due to the current lockdown and social distancing restrictions in view of COVID-19 Pandemic some of the data was made available to me in electronic form by the secretarial team of the Company and such data will be verified physically after the restrictions are lifted.



Date: 01/07/2020
Place: Mumbai

For KRS AND CO.
Practicing Company Secretaries

A handwritten signature in blue ink, appearing to read "Ketan Shirwadkar".

Mr. Ketan Ravindra Shirwadkar
Proprietor
ACS No. 37829
COP No. 15386
UDIN: A037829B000405724



KRS AND CO.

Practicing Company Secretaries

To,
Konark Synthetic Limited,
CIN: L17200MH1984PLC033451
Mittal Industrial Estate,
Bldg No.7, Saki Naka,
Andheri (East), Mumbai -400059

My report of even date to be read along with this letter;

1. Maintenance of records is the responsibility of the management of the Company. My responsibility is to express an opinion on these records based on my audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I have followed provide a reasonable basis for my opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Wherever required I have obtained the Management representation about the compliance of SEBI laws, rules and regulations thereof.
5. The compliance of the provisions of SEBI laws, rules and regulations is the responsibility of the management. My examination was limited to the verification of procedures on test basis.
6. This report is neither an assurance as to future viability of the Company nor of the efficacy and effectiveness with which the management has conducted the affairs of the Company.



Date: 01/07/2020
Place: Mumbai

For KRS AND CO.
Practicing Company Secretaries

Mr. Ketan Ravindra Shirwadkar
Proprietor
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