

KONARK SYNTHETIC LIMITED

CIN: L17200MH1984PLC033451

Reg Off: Bldg. No. 7, Mittal Industrial Estate, Andheri-Kurla Road, Saki-Naka, Andheri (E), Mumbai 400059
Tele No. 022-40896300, Fax No. 022-40896322, E mail Id: info@konarkgroup.co.in web: www.konarkgroup.co.in .

Date: 30th May, 2022

To,

The Manager - DCS,

BSE Limited,

Phiroze Jeejeebhoy Towers,

Dalal Street, Mumbai- 400 001

Dear Sir,

Scrip Code: 514128

Subject: Annual Secretarial Compliance Report for the Financial Year 2021-22

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended), read along with SEBI circular CIR/CFDI/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by HSPN & ASSOCIATES LLP., Practicing Company Secretaries for the financial year 2021-22.

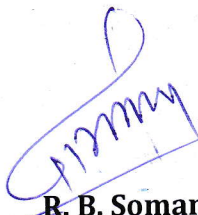
This is for the information of the exchange and the members.

Kindly acknowledge.

Thanking you,

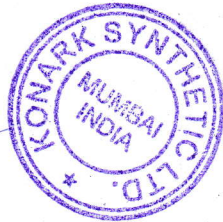
Yours faithfully,

For Konark Synthetic Limited,



R. B. Somany

Chief Financial Officer





**HSPN & ASSOCIATES LLP
COMPANY SECRETARIES**

LLPIN: AAZ-8456 | Unique Code: L2021MHE011400
(Formerly known as HS ASSOCIATES
Unique Code: P2007MH004300)

KETAN R. SHIRWADKAR (Designated Partner)
B.COM. ACS.

206, 2nd Floor, Tantia Jogani Industrial Estate,
J. R. Boricha Marg, Opp. Lodha Excelus,
Lower Parel East Mumbai – 400011.
Tel: 022 23088998/23008998/40026600/40061100.
Email: ketan@hspnassociates.in
Web: www.hspnassociates.in

Secretarial compliance report of Konark Synthetic Limited for the year ended 31st March 2022

To
The Board of Directors,
Konark Synthetic Limited.
Bldg No. 7, Mittal Industrial Estate,
Saki Naka, Andheri (E), Mumbai 400059

I Ketan Shirwadkar, Designated Partner of HSPN & ASSOCIATES LLP have examined:

All the documents and records made available to me and the explanation provided by Konark Synthetic Limited ("the listed entity"),

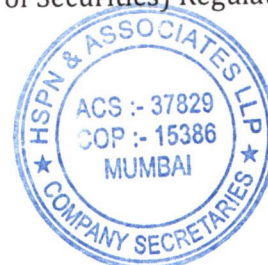
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31st March 2022 ("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, have been examined, include: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; -- **not applicable for the period under review;**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - **not applicable for the period under review;**



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(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 erstwhile Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, & 2014 & SEBI (Issue of Sweat Equity) Regulations, 2002; - **not applicable for the period under review;**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 erstwhile Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 & Securities and Exchange Board of India (Issue and Listing of Nonconvertible and Redeemable Preference Shares) Regulations, 2013; - **not applicable for the period under review;**

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(h) SEBI (Depositories and Participants) Regulations, 2018 erstwhile SEBI (Depositories and Participants) Regulations, 1996;

(i) Disclosures by listed entities of defaults on payment of interest/ repayment of principal amount on loans from banks / financial institutions, debt securities, as per SEBI circular CIR/CFD/CMD/93/2017 dated August 4, 2017;

(j) Strengthening the Guidelines and Raising Industry standards for RTAs, Issuer Companies, and Banker circular no. SEBI/HO/MIRSD/DOS3/CIR/P/2018/115 dated July 16, 2018, read with SEBI circular no. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018;

(k) Standard Operating Procedure for suspension and revocation of trading of specified securities circular no. SEBI/HO/CFD/CMD/CIR/P/2018/77 dated May 3, 2018

(l) System-driven Disclosures in Securities Market as per SEBI circular SEBI/HO/CFD/DCR1/CIR/P/2018/85 dated May 28, 2018;

(m) Annual Secretarial audit report and annual secretarial compliance report for listed entities as per SEBI circular CIR/CFD/CMD1/27/2019 dated February 08, 2019;

(n) Standardised norms for transfer of securities in physical mode SEBI/HO/MIRSD/DOS3/CIR/P/2018/139 dated November 6, 2018;

(o) Disclosure of reasons for the delay in submission of financial results by listed entities as per SEBI circular CIR/CFD/CMD-1/142/2018 dated November 19, 2018;

(p) Disclosure of significant beneficial ownership in the shareholding pattern as per SEBI circular SEBI/HO/CFD/CMD1/CIR/P/2019/36 dated March 12, 2019;

(q) Database for Distinctive Number (DN) of Shares as per SEBI circular SEBI/HO/MRD/DOP2DSA2/CIR/P/2019/87 dated August 01, 2019;

(r) Resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI circular CIR/CFD/CMD1/114/2019 dated October 18, 2019;

(s) Reporting to Stock Exchanges regarding violations under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct (CoC) dated July 23, 2020;

(t) Handling of SCORES complaints by stock exchanges and Standard Operating Procedure for non-redressal of grievances by listed companies SEBI/HO/OIAE/IGRD/CIR/P/2020/152 dated 13 August 2020;



(u) Re-lodgement of Transfer Requests Shares SEBI/HO/MIRSD/RTAMB/CIR/P/2020/166
September 07, 2020;

(v) System-Driven Disclosures (SDD) under SEBI (SAST) Regulations, 2011
SEBI/CIR/CFD/DCR1/CIR/P/2020/181 September 23, 2020;

(w) Automation of Continual Disclosures under Regulation 7(2) of SEBI (Prohibition of
Insider Trading) Regulations, 2015 - System driven disclosures.
SEBI/HO/ISD/ISD/CIR/P/2020/168 September 09, 2020;

(x) Operational guidelines for Transfer and Dematerialization of re-lodged physical shares
dated SEBI/HO/MIRSD/RTAMB/CIR/P/2020/236 December 02, 2020;

(y) E-Voting Facility Provided by Listed Entities SEBI/HO/CFD/CMD/CIR/P/2020/242
December 09, 2020;

z) Automation of System Driven Disclosures as per SEBI Circular No.
SEBI/HO/ISD/ISD/CIR/P/2020/168 dated September 09, 2020;

(aa) Common and Simplified Norms for processing investor's service requests by RTAs and
norms for furnishing PAN, KYC details, and Nomination dated
SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2021/655 November 03, 2021

(ab) Issuance of Securities in dematerialized form in case of Investor Service Requests dated
SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2022/8 January 25, 2022

(ac) Format of compliance report on Corporate Governance by Listed Entities dated
SEBI/HO/CFD/CMD-2/P/CIR/2021/567 May 31, 2021:

(ad) disclosure obligations of listed entities in relation to Related Party Transactions.
SEBI/HO/CFD/CMD1/CIR/P/2021/662 dated November 22, 2021 ;

(ae) Automation of disclosure requirements under SEBI (Substantial Acquisition of
Shares and Takeovers) Regulations, 2011-System Driven Disclosures - Ease of doing
business circular no. SEBI/HO/CFD/DCR-3/P/CIR/2022/27 dated March 7, 2022

And 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.	<p>Regulation 33(3)(d) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:</p> <p>The listed entity shall submit audited standalone financial results for the financial year, within sixty days from the</p>	<p>Delay in submission of Audited Financial results within the period prescribed under this regulation for quarter/year ended 31st March, 2021</p>	<p>There was a delay of 6 days in submission of Audited Financial Results for the quarter and year ended 31st March, 2021.</p> <p>As informed by the management, the Company had made a representation for waiver of fine and BSE</p>



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	<p>end of the financial year along with the audit report. Provided that if the listed entity has subsidiaries, it shall, while submitting annual audited standalone financial results also submit annual audited consolidated financial results along with the audit report.</p>		<p>vide its mail dated 25th October, 2021 waived the said fine.</p>
2.	<p>Regulation 46 of SEBI (LODR) Regulations, 2015;</p> <p>The listed entity shall maintain a functional website containing the basic information about the listed entity.</p>	<p>Th website of the Company is not in compliance pursuant to Regulation 46 of SEBI (LODR) Regulations, 2015.</p>	<p>The website of the Company is not updated with the information required as per Regulation 46 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.</p>
3.	<p>System-driven Disclosures in Securities Market as per SEBI circular SEBI/HO/CFD/DCR1/CIR/P/2018/85 dated May 28, 2018;</p>	<p>The Data Base of Directors /Employees is not updated.</p>	<p>It is observed that subsequent changes in Directors /Employees of the Company is not updated in the database.</p>
4.	<p>Common and Simplified Norms for processing investor's service requests by RTAs and norms for furnishing PAN, KYC details, and Nomination dated SEBI/HO/MIRSD/MIRSD_R TAMB/P/CIR/2021/655 November 03, 2021</p>	<p>The Company has not disseminated the requirement of the holders of physical securities to furnish valid PAN,KYC details and Nomination, on its website as per the said circular.</p>	<p>The Website Compliance with respect to the said circular is not complied by the Company.</p>

- (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 that record.
- (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	The action was 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.	BSE Limited	<p>Regulation 33(3)(d) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:</p> <p>Delay in submission of Audited Financial results within the period prescribed under this regulation for quarter/year ended 31st March, 2021</p>	<p>BSE vide its e-mail dated 29th July, 2021 had levied a penalty of Rs. 35,400/- (Rupees Thirty-Five Thousand Four Hundred Only) inclusive of GST which was subsequently waived off vide BSE's mail dated 25th October, 2021.</p>	<p>There was a delay of 6 days in submission of Audited Financial Results for the quarter and year ended 31st March, 2021.</p> <p>As informed by the management, the Company has made a representation for waiver of fine and BSE vide its mail dated 25th October, 2021 waived the said fine.</p>

(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 report for the year ended 31 st March, 2020 and 31 st March, 2019	Observations were made in the secretarial compliance report for the year ended. 31 st March 2021	Actions are taken by the listed entity if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity



1.	<p>No observation for the Financial Year Ended 31st March, 2020.</p> <p>Observation for Financial Year Ended 31st March, 2019:</p> <p>Regulation 33 of SEBI (LODR) Regulations, 2015:</p> <p>Delay in submission of of Audited Consolidated Financial Results for the Quarter and Year Ended 31st March 2018</p>	<p>Regulation 33(3)(d) of SEBI (LODR) Regulations, 2015:</p> <p>Delay in submission of Audited financial results within the period prescribed under this regulation for quarter/year ended 31st March, 2020</p>	<p>The Company had made representation for waiver of penalty, of Rs. 200600/- (Rupees Two Lakhs Six Hundred Only) inclusive of GST and the same was approved by BSE vide their e-mail dated 06-09-2021</p>	<p>It is observed that there is delay in submission of Audited Financial Results for the Quarter and Year ended 31st march, 2021 in the financial year 2021-22</p>
2.	<p>No Observation for the Financial Year Ended 31st March, 2020 and 31st March, 2019</p>	<p>Regulation 33 of SEBI (LODR) Regulations, 2015:</p> <p>Delay in submission of Un-audited financial results within the period prescribed time under this regulation for quarter ended 30th June, 2020</p>	<p>The Company has made representation for waiver of penalty, of Rs. 47200/- (Forty Seven Thousand Two Hundred Only) inclusive of GST.</p>	<p>It is observed that there is Delay in submission Audited Financial Results for the Quarter and Year Ended 31st March, 2021 during the Financial Year 2021-22</p>
3.	<p>No Observation for the Financial Year Ended 31st March, 2020 and 31st March, 2019</p>	<p>Regulation 29 of SEBI (LODR) Regulations, 2015:</p> <p>Delay in intimation of Notice of Adjourned Board Meeting for the Quarter and Half Year Ended 30th September, 2020</p>	<p>The Company has taken cognizant of the same and there is no delay in intimation of Board Meeting during the Financial Year 2021-22</p>	<p>There was no instance of delay.</p>



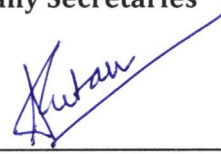
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1. This report is based on the following:
 - a) Compliances required to be done by the Company during the Financial Year ended 31st March, 2022 (i.e., the period covered for the purpose of this Report is from 01st April, 2021 to 31st March, 2022.
2. At the 37th Annual General Meeting of the Company held on Thursday 30th September, 2021, the members of the Company appointed M/s. Jhunjhunwala Jain & Associates LLP as Statutory Auditors of the Company for a period of five (5) consecutive years and the Company has ensured that the conditions mentioned under clause 6(A) and 6(B) of Circular No. CIR/CFD/CMD1/114/2019 dated 18th October, 2019 issued by SEBI are included in the terms of appointment of Statutory Auditors.

Place: Mumbai.
Date: 30/05/2022
ICSI UDIN: A037829D000429638
PEER REVIEW NO: P2007MH004300

For HSPN & ASSOCIATES LLP
Company Secretaries



Ketan R. Shirwadkar
Designated Partner
ACS No.: 37829
COP No.: 15386

