

Ref: ASL/BSE /2023-24

Date: 30.05.2024

To,
The Corporate Relations department
Bombay Stock Exchange Limited
Department of Corporate Services
P J Towers, Dalal Street, Fort,
MUMBAI-400001

Re: Advance Syntex Limited
Script Code: 539982

Subject: Submission of Annual Secretarial Compliance Report for the financial year ended 31st
March 2024

Dear Sir/Madam,

Pursuant to SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and as per amended Regulation 24A(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith copy of the Annual Secretarial Compliance Report of the Company issued by Mr. Devesh R Desai, Practicing Company Secretay, Vadodara, Gujarat, India for the financial year ended 31st March, 2024.

The same is being also uploaded at the website of the Company i.e. www.midasglitter.in.

Kindly take the above information on record .

Thanking You,

For Advance Syntex Limited



Bhavan Vora
Managing Director
DIN: 01613974



Devesh R. DESAI
COMPANY SECRETARY

40-D, Arpita Park, Near ESI Hospital,
Gotri Road, Vadodara-390 021.
(M) 9879533717

Devesh R. Desai
M.Com. LL.B. ACS
deveshrdesai2002@rediffmail.com

To,
The Board of Directors,
Advance Syntex Limited,
CIN No. L17119GJ1990PLC014406
233/2 & 238/2, GIDC, Por,
Ramangamdi, Vadodara-391243

Sub.: Annual Secretarial Compliance Report for the Financial Year 2023-2024

Dear Sir,

I have been engaged by **ADVANCE SYNTEX LIMITED** (hereinafter referred to as the ('Company') [CIN: **L17119GJ1990PLC014406**] whose equity shares are listed on BSE Limited, to conduct an audit in terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the Management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

My audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report for the year ended 31st March, 2024 is enclosed.



Devesh R. Desai
Practicing Company Secretary
ACS#11332 CP#7484
Place: Vadodara

Date: 30/05/2024

UDIN No. A011332F000502119
Peer Review Certificate No. : 2043/2022



Devesh R. DESAI
COMPANY SECRETARY

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Annual Secretarial Compliance Report of Advance Syntex Limited for the year ended 31st March, 2024

I Devesh R. Desai, Practicing Company Secretaries, have examined:

(a) all the documents and records made available to us and explanation provided by **Advance Syntex Limited (CIN No. L17119GJ1990PLC014406)** (“the listed entity”),

(b) the filings/ submissions made by the listed entity to the stock exchanges,

(c) website of the listed entity,

(d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2024 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; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder (hereinafter as “Insider Trading regulations”);

(i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulation, 2009. There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(j) Securities and Exchange Board of India (Depositories and Participants) Regulation, 2018.

Circulars/guidelines issued thereunder 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:-

(b)

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviation	Action Taken by	Type of Action (A division/ Clarification/ Fine/Show Cause Notice/ warning etc)	Details of Violation	Fine Amounts	Observation/ Remarks of the Practicing Company Secretary	Management

1.	Regulation 14 of SEBI (LODR) Regulation, 2015	Regulation 14 of SEBI (LODR) Regulation, 2015	Suspension Notice for Non-Payment of Annual Listing Fees vide email dated 17 th April, 2023	BSE	Suspension Notice for Non-Payment of Annual Listing Fees	Suspension Notice for Non-Payment of Annual Listing Fees	BSE Listing Fees paid by the Company on 03/05/2023	BSE Listing fee paid	
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There had been no further update in the matter reported under point 1 (b) below as the said matter is still pending as informed by management.

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

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviation	Action Taken by	Type of Action (Adivision/ Clarification/ Fine/Show Cause Notice/ warning etc)	Details of Violation	Fine Amount	Observation/ Remarks of the Practicing Company Secretary	Management Response
1.	Regulation 29(2)/29(3) Furnishing prior intimation about the meeting of the Board of Director	Regulation 29(2)/29(3)	BSE imposed Fine of Rs. 11,800	BSE	Fine imposed	Furnishing prior intimation about the meeting of the Board of Director	Rs. 11800/-	The Company has submitted letter for waiver of fine with proper reason to BSE through email dated 25/01/2021 & 24/04/2021	As of date, no reply was received from BSE as on 31/03/24

								As of date, no reply was received from BSE as on 31/03/2024	
2.	Regulation 31 Non-submission of shareholding pattern within the period prescribed	Regulation 31	BSE imposed fine	BSE	Fine imposed	late submission of Shareholding Pattern for the quarter ended June, 2022.	Rs. 16520/-	Fine imposed by the stock exchange which the Company had not paid on 31/03/2024. The Company has submitted letter for waiver of fine with proper reason to BSE	The Company has submitted letter for waiver of fine with proper reason to BSE
3.	Regulation 23 (9) Disclosures of related party transaction on a consolidated basis	Regulation 23 (9)	BSE imposed fine	BSE	Fine imposed	late submission of Half yearly disclosure report for the half year ended	Rs. 88,500/-	The Company has submitted letter for waiver of fine with proper reason to BSE through	The Company has submitted letter for waiver of fine with proper reason to BSE through

						September, 2022		email dated 19/01/2023 no reply was received from BSE	email dated 19/01/23, no reply was received from BSE
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I hereby report that, during the Review Period the compliance status of the listed entity is appended below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<p>Secretarial Standard</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p>	Yes	Not Any
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> 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 Yes	Not Any Not Any
3.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> 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 redirects to 	Yes Yes Yes	Not Any Not Any Not Any

	the relevant document(s)/ section of the website		
4.	<p>Disqualification of Director:</p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	Not Any
5.	<p>To examine details related to Subsidiaries of listed entities:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	N. A.	The Company does not have any Subsidiary
6.	<p>Preservation of Documents:</p> <p>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</p>	Yes	Not Any
7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations/ Companies Act, 2013</p>	Yes	Not Any
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions</p> <p>(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</p>	<p>Yes</p> <p>No Such Case</p>	<p>Not Any</p> <p>Not Any</p>

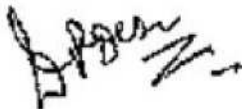
9.	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	Not Any
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	Yes	Not Any
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No Actions 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</p>	Yes	Not Any
12.	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>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(ies) 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 listed entities</p>	N A	No case of resignation of statutory auditor from the listed entity or its material subsidiary during the review period.
13.	<p>Additional Non-compliances, if any:</p> <p>No any additional non-compliance observed for all SEBI regulation/circular/guidance note</p>	N.A.	There is no such event

	etc.		during the year under review
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Compliance 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 are Nil.

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 report 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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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.




Devesh R. Desai
Practicing Company Secretary
ACS#11332 CP#7484

Date: 30/05/2024

UDIN No. A011332F000502119

Peer Review Certificate No. : 2043/2022