



A. K. SPINTEX LIMITED

Regd. Off. & Works : 14th K.M. Stone, Chittorgarh Road
Village : Biliya Kalan, BHILWARA - 311 001 (Raj.)
Ph.: +91-1482-249002, 249003, 249004
Fax : +91-1482-249007
E-mail : akspintex@gmail.com

June 30, 2021

Online filling at www.listing.bseindia.com

To,
BSE Ltd.
Department of Listing Compliance
P.J. Tower, Dalal Street, Fort
MUMBAI - 400001

BSE SCRIP: 539300

Sub: Annual Secretarial Compliance Report for the Financial Year Ended 31st March, 2021

Dear Sir,

In terms of SEBI Circular No. CIR/CFD/CMD/27/2019 dated February, 08, 2019 please find enclosed herewith the Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2021

Kindly acknowledge the receipt and take the above information on your record.

Thanking You

Yours faithfully

For: A.K. SPINTEX LIMITED

**Ashish Kumar Bagrecha
Company Secretary & Compliance Officer**



ANIL SOMANI & ASSOCIATES

Company Secretaries

D-94, 1st Floor, Indra Market, Bhilwara, Rajasthan - 311001

Email Id: corporatesolutions14@gmail.com, (M) 09166611876

Secretarial compliance report of A.K. Spintex Limited for the year ended 31st March, 2021

1. We have examined:-

- (a) all the documents and records made available to us and explanation provided by **A.K.Spintex Limited** (“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, 2021 (“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”);

2. 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;
- (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;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And based on the above examination, 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:

Sr. No.	Compliance Requirement (Regulations/circulars/Guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	<i>Regulation 34 Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</i>	<i>Delayed filing of annual report for financial year 2019-20 in XBRL under Regulation 34</i>	<i>The listed entity has delayed filed annual report for financial year 2019-20 in XBRL mode on 28.06.2021</i>
2.	<i>Regulation 40 (9) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</i>	<i>Delayed filing of Disclosure of certificate under Regulation 40 (9)</i>	<i>The listed entity has Delayed filed certificate under Regulation 40 (9) for the year ended 31.03.2020 on 13.06.2020.</i>
3.	<i>Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015</i>	<i>Delayed closure of trading window for declaration of quarterly financial results</i>	<i>The listed entity has delayed closed trading window for the quarter ended 31.03.2020 and 31.12.2020</i>
4.	<i>Regulation 74(5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018</i>	<i>Non filing of Confirmation certificate under Regulation 74(5)</i>	<i>Confirmation certificate under Regulation 74(5) for the quarter ended 31.12.2020, has not filed.</i>
5.	<i>SEBI Circular SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018 regarding Fund raising by issuance of Debt Securities by Large Entities</i>	<i>Non filing of disclosure SEBI Circular SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018 regarding Fund raising by issuance of Debt Securities by Large Entities</i>	<i>The listed entity has not filed disclosure SEBI Circular SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018 regarding Fund raising by issuance of Debt Securities by Large Entities for FY 2019-20.</i>
6.	<i>Regulation 46 Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</i>	<i>Website of the Company is not updated</i>	<i>The listed entity has not maintained updated website as per Regulation 46</i>

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from our examination of those records.
- (c) No action was taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI 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.
- (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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	<i>The listed entity has filed statement of investor complaints for the quarter ended 31.03.2019 on 03.05.2019</i>	<i>The Company has taken adequate measures to avoid lapse in future.</i>	<i>The company has delayed filed statement of investor complaints for the quarter ended 31.03.2019 on 03.05.2019</i>
2.	<i>The listed entity has not filed Disclosure of related party transaction for the year ended 31.03.2019.</i>	<i>The Company has taken adequate measures to avoid lapse in future.</i>	<i>The company has not filed Disclosure of related party transaction for the year ended 31.03.2019.</i>
3.	<i>The listed entity has delayed closed trading window for the quarter ended 31.03.2019, 30.06.2019, 30.09.2019 31.12.2019</i>	<i>The Company has taken adequate measures to avoid lapse in future.</i>	<i>The company has delayed filed intimation for closure of trading window for the quarter ended 31.03.2019, 30.06.2019, 30.09.2019 31.12.2019</i>
4.	<i>Confirmation certificate under Regulation 74(5) for the quarter ended 31.03.2019, 30.06.2019, 30.09.2019 and 31.12.2019 has not filed.</i>	<i>The Company has taken adequate measures to avoid lapse in future.</i>	<i>The company has not filed Certificate under Regulation 74(5) for the quarter ended 31.03.2019, 30.06.2019, 30.09.2019 and 31.12.2019</i>

For **Anil Somani & Associates**
Company Secretaries

ANIL KUMAR SOMANI
Digitally signed by ANIL KUMAR SOMANI
Date: 2021.06.30 10:21:01 +05'30'

Anil Kumar Somani

ACS: 36055

COP: 13379

UDIN: A036055C000533640

Place: Bhilwara

Date: 29th June, 2021