



Syncom Formulations (India) Limited

A WHO-GMP & ISO 9001-2015 Certified Company

CIN No. : L24239MH1988PLC047759

SYNCOM/SE/2021-22

21st June, 2021

Online Filing at: www.listing.bseindia.com

To,
The General Manager
DCS-CRD
BSE Ltd.
P.J. Tower, Dalal Street, Fort,
MUMBAI - 400001

BSE CODE: 524470

Sub: Submission of the Annual Secretarial Compliance Report for the year ended 31/03/2021.

Dear Sir/Ma'am,

With reference to the terms of clause 3(b)(iii) of the SEBI Circular No. *CIR/CFD/CMD1/27/2019 dated 8th February, 2019*; we hereby submit the Annual Secretarial Compliance Report for the year ended 31.03.2021.

Further, the Annual Secretarial Compliance Report will also be filed in XBRL mode within the stipulated time period.

You are requested to please take on record the above said document for your reference and further needful.

Thanking You,

Yours Faithfully,

For, **SYNCOM FORMULATIONS (INDIA) LIMITED**


SHUBHAM DUBEY
COMPANY SECRETARY &
COMPLIANCE OFFICER

Encl: - a/a

Bringing a smile on every face...



SECRETARIAL COMPLIANCE REPORT

(Pursuant to Regulation 24A of the SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019)

OF

SYNCOM FORMULATIONS (INDIA) LIMITED

for the year ended 31.03.2021

I, CS (Dr.) Dilip Kumar Jain, proprietor of M/s D.K. Jain & Co., Company Secretaries have examined:

- all the documents and records made available to us and explanation provided by **Syncom Formulations (India) Limited** (CIN L24239MH1988PLC047759) ("the Listed Entity"),
- the filings/ submissions made by the listed entity to the BSE Ltd., - www.bseindia.com
- website of the Syncom Formulations (India) Ltd. www.sfil.in,
- 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:

- 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, as amended from time to time and applicable, have been examined, include: -

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- SEBI (Buyback of Securities) Regulations 2018;
- SEBI (Share Based Employee Benefits) Regulations, 2014;
- SEBI (Issue and Listing of Debt Securities) Regulations, 2008;
- SEBI (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- SEBI (Prohibition of Insider Trading) Regulations, 2015;
- circulars/guidelines issued thereunder;

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

- The listed entity has complied with the provisions of the above Regulations, circulars, notifications and guidelines issued thereunder and as applicable to it, (however, the Regulations mentioned above under (d) to (g) are not applicable to the company as there were no such activities as covered under the said regulations during the period under review) except in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations/ guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
		Nil	



- (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 examination of those records.
- (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.	Action 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.
NIL				

- (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	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The company is in compliance of all the orders and restrictions as imposed by the SEBI in that matter. Further that the Company has made an appeal before the SAT vide Case No. 181 of 2018 and partial outcome of the appeal is pending with the SAT.	31.03.2019	The Company is continuing protecting its interest before the SEBI (SAT) and by way of an appeal SEBI (SAT) have partially allowed the relief prayed by the order dated 27.09.2019. The Company is waiting for the final order against the appeal.	Th Company has taken appropriate action. Since the matter is sub-judice, we do not offer any further comment

Place: Indore
Date: 19th June, 2021
UDIN: F003565C000489259

For, D. K. JAIN & CO.,
COMPANY SECRETARIES
FRN No. I1995MP067500

CS (Dr.) D. K. JAIN
PROPRIETOR
FCS No.: 3565
CP No.: 2382
Peer Review: 743/2020

