

27th May, 2019

The Manager,
Dept of Corp. Services,
Bombay Stock Exchange Limited,
P. J. Towers, Dalal Street,
Mumbai- 400 001.

Scrip No: 500192

Sub: Submission of Annual Compliance Report

Respected Sir or Madam,

With reference to the above captioned subject matter and pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 read with SEBI circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, enclosed herewith find the Annual Secretarial Compliance Report for the Financial Year 2018-19

Kindly take the same on your & oblige

Thanking You,

Yours faithfully,

For PRAG BOSIMI SYNTHETICS LTD.



Madhu P. Dharewa
Company Secretary

PRACTICING COMPANY SECRETARY

Office No. 3D, 801, Building Dheeraj Upvan, Sidharth Nagar, Borivali East, Mumbai 400066. Email id: amitmundra.cs@gmail.com, M. No. 9137516317

**SECRETARIAL COMPLIANCE REPORT
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2019**

To,

The Board of Directors,

Prag Bosimi Synthetics Limited

House No 4, Nilgiri Path,

R.G.Barua Road,

Near Doordarshan ,

Guwahati,

Assam-781024

I Mr. Amit Mundra, Practising Company Secretary, having office at Office No. 3D, 801, Building Dheeraj Upvan, Sidharth Nagar, Borivali East, Mumbai 400066 have examined:

- a) all the documents and records made available to us and explanation provided by Prag Bosimi Synthetics Limited (hereinafter referred to as "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, 2019 ("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 there under; and
- b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;



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- 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;
- i) The Compliance by the Company of applicable financial laws, like Direct and Indirect tax laws, has not been reviewed in this Audit since the same have been subject to review by statutory financial audit and other designated professionals.

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 there under, 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.	NIL	NIL	NIL

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my/our examination of those records.

- (c) The listed entity has been maintaining its website which is <http://www.pragbosimi.com> and its operational under the provisions of the Regulations and circulars/ guidelines issued there under insofar as it appears from my/our examination of those records.

- (d) 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 there under:



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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.
1.	Notice received from BSE Ltd dated 31.10.2018 for the quarter ended with September 2018	1. Non Submissions of Corporate Governance Report as per Regulation 27(2) of SEBI (LODR) Regulation, 2015 for the quarter ended with September 2018 2. Non Compliance with the provisions of Regulation 17(1), 18(1), 19(1) , (2) and 20(2), 21(2) of the LODR Regulations, 2015	Rs 542800/- including GST.	The Company has filed revised Corporate Governance Report in compliance with the Regulations as prescribed and intimated to the Exchange as per the acknowledgement dated 13.11.2018. Also, the Company has replied through email & telephonic conversation that women Director is already included in the composition of the Board and has been appointed from the date when such Regulations came into effect. Hence, the Company requested to the exchange about the reverse of charges or penalty which the exchange has erroneously charged.



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(e) 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 31.03.2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NA	NA	NA	NA	NA



Date: 27/05/2019
Place: Mumbai

AMIT MUNDRA
Practicing Company Secretary
ACS No.: F7933
C P No.:16182