

Ref: ASCL/SEC/2022-23/23

May 30, 2022

1. To,  
The General Manager  
Department of Corporate Services  
**BSE Limited**  
1<sup>st</sup> Floor, New Trading Ring  
Rotunda Building, P. J. Tower  
Dalal Street, Fort  
**Mumbai - 400 001**  
**BSE Scrip Code: 532853**

2. To,  
The General Manager (Listing)  
**National Stock Exchange of India Ltd**  
5<sup>th</sup> Floor, Exchange Plaza  
Plot No. C/1, G Block  
Bandra - Kurla Complex  
Bandra (East)  
**Mumbai - 400 051**  
**NSE Trading Symbol: ASAHISONG**

**SUB: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE YEAR ENDED MARCH 31, 2022**

**REF: REGULATION 24A OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith a copy of Annual Secretarial Compliance Report for the financial year ended March 31, 2022.

You are requested to take the same on record.

Thanking you,

Yours faithfully,

For, **ASAHI SONGWON COLORS LIMITED**



**SAJI JOSEPH**

**Company Secretary and Compliance Officer**



Encl: As above

**Asahi Songwon Colors Ltd.**

CIN: L24222GJ1990PLC014789

Regd. Office: "Asahi House", 13, Aaryans Corporate Park, Nr. Shilaj Railway Crossing, Thaltej-Shilaj Road, Thaltej, Ahmedabad-380 059, Gujarat. India

Tele : 91-79 6832 5000 • Fax : 91-79 6832 5099 • Web Site: www.asahisongwon.com





## SECRETARIAL COMPLIANCE REPORT

of M/s. Asahi Songwon Colors Limited for the year ended 31<sup>st</sup> March, 2022

To,  
The Board of Directors  
Asahi Songwon Colors Limited  
Asahi House, 13, Aryans Corporate Park,  
Nr. Shilaj Rly. Crossing, Thaltej,  
Ahmedabad-380059

We, M/s. Shyamsingh Tomar & Associates, Practicing Company Secretary,  
have examined:

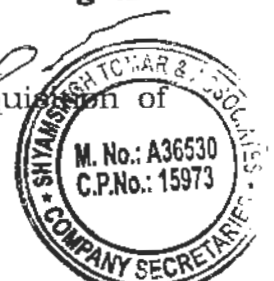
- (a) all the documents and records made available to us and explanation provided by Asahi Songwon Colors Limited ("the listed entity");
- (b) the filings/ submissions made by the listed entity to the BSE Limited and National Stock Exchange of India Limited;
- (c) website of the listed entity;
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31<sup>st</sup> March, 2022 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 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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(No events during the review period)**
- (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; **(No events during the review period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(No events during the review period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(No events during the review period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (to the extent applicable)
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- (j) During the review period, there were no events which required Compliance with conditions as mentioned in Para 6(A) & 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019

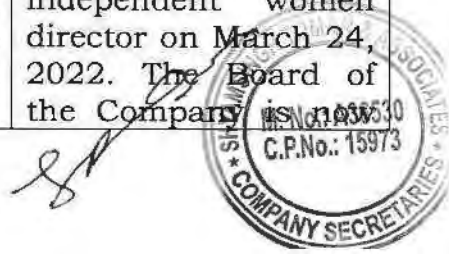
and circulars and guidelines issued there under;

However, it has been observed that there were no events requiring compliance under the regulations covered under para (b), (e), (f), and (g) mentioned hereinabove.

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:-

Sl. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observation/ Remark of the Practicing Company Secretary.
1.	Regulation 17 (1) of SEBI (Listing Obligation and Disclosure Requirements), Regulations,	Pursuant to proviso to Regulation 17(1)(a) of the SEBI Listing Regulations requires that with effect from 1 <sup>st</sup> April,	The Company has appointed independent women director on March 24, 2022. The Board of the Company

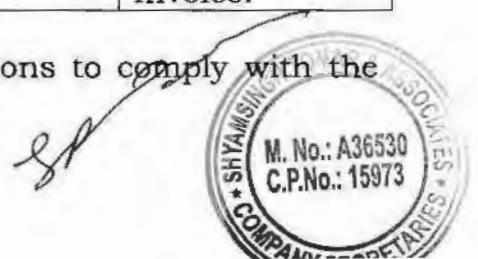


	2015	2021, the Board of all of the top 1000 listed entities (market cap wise) shall have at least one independent woman director.	duly constituted. The Company has duly paid penalty levied by BSE Limited and National Stock Exchange of India Limited in this regard.
2.	Regulation 21 of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015	Pursuant to proviso to Regulation 21 of the SEBI Listing Regulations requires that the Board of all of the top 1000 listed entities (market cap wise) shall constitute risk management committee.	The Company has already constituted risk management committee vide board meeting held on October 26, 2021. The Company has duly paid penalty levied by BSE Limited and National Stock Exchange of India Limited in this regard.

- (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 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 there under:

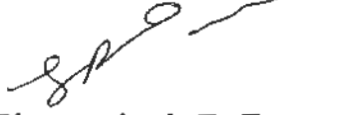
Sl. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary, if any.
1.	BSE Limited and National Stock Exchange of India Limited	Non-compliance to Regulation 17 (1) and 21 of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015.	Penalty levied by BSE Limited and National Stock Exchange of India Limited have been paid by the Company.	The company has paid penalty to the BSE Limited National Stock Exchange of India Limited as per their Invoice.

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



Sl. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
N.A				

For, **SHYAMSINGH TOMAR & ASSOCIATES**  
**Company Secretaries**



Shyamsingh R. Tomar

**[Proprietor]**

M. No.: 36530

COP No.: 15973

PR No.: 1076/2021



**UDIN:** A036530D000427118

Date: 30/05/2022

Place: Ahmedabad