

June 28, 2021.

BSE Limited

Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai – 400 001.
Scrip Code: 532830

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block G
Bandra Kurla Complex, Bandra (East)
Mumbai – 400 051.
Trading Symbol: ASTRAL

Dear Sir/Madam,

Sub.: Annual Secretarial Compliance report for the year ended March 31, 2021.

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019, we enclose herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021 issued by Ms. Monica Kanuga, Practicing Company Secretary.

Kindly take the same on your record.

Thanking you,

Yours faithfully,

For Astral Limited



Krunal Bhatt
Company Secretary

Encl.: As above

Monica Kanuga

Company Secretary

8, Pritamnagar,

Ellisbridge, Ahmedabad - 380 006.

Phone : (O) 079 - 40023930

E-mail : monica@monicacs.in

SECRETARIAL COMPLIANCE REPORT

OF ASTRAL LIMITED
(ERSTWHILE ASTRAL POLYTECHNIK LIMITED)
for the year ended 31st March, 2021

I, Monica Kanuga, have examined:

- (a) all the documents and records made available to us and explanation provided by Astral 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");

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 (Share Based Employee Benefits) Regulations, 2014;
- (e) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (f) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with Client

and 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,
- (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 my examination of those records.
- (c) The following are the details of actions taken against the listed entity/its promoters/ directors/ material subscribers 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.
NOT APPLICABLE				



- (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.... (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
This clause is not applicable as no observations were made in the previous report				

Note : The records have been verified and examined online for the purpose of issuing this Report, as facilitated by the Company, due to Covid 19 and subsequent lockdown situation. However, necessary confirmation for the authenticity of the records received has been provided by the Company.

UDIN : F003868C000323715

Place : Ahmedabad

Date : 18th May, 2021

Signature:

Name : Monica Kanuga

FCS No. : 3868

C.P. No. : 2125

