

June 30, 2021

BSE Limited

Corporate Relationship Dept.,
P.J Towers, Dalal Street
Fort, Mumbai – 400 001

Scrip Code: 531847/ Scrip Id: ASTAR

Subject: Annual Secretarial Compliance Report for the financial year ended 31st March, 2021

Pursuant to Regulation 24A of the SEBI (Listing Obligations and disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2021, issued by M/s Yogesh D. Dabholkar & Co., Practicing Company Secretary.

We request you to take the above information on record.

Thanking you,

Yours faithfully,
For **ASIAN STAR COMPANY LIMITED**



VIPUL P. SHAH
MANAGING DIRECTOR & CEO
DIN: 00004746



Asian Star Company Limited 114, Mittal Court - C, Nariman Point, Mumbai - 400 021, India. CIN: L36910MH1995PLC086017
T: +91 22 62444111 F: +91 22 2204 3747, +91 22 2284 2427 E: info@asianstargroup.com www.asianstargroup.com



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Secretarial Compliance Report of Asian Star Company Limited

For the Financial Year Ended 31st March, 2021

To,
The Board of Directors
ASIAN STAR COMPANY LIMITED,
114-C, Mittal Court, Nariman Point,
Mumbai - 400021.

I have examined:

- (a) all the documents and records made available to us through scanned copies by email or through permitted access to the Company's computer system through internet and explanation provided by **ASIAN STAR COMPANY 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");



**YOGESH D. DABHOLKAR & Co.
COMPANY SECRETARY**

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 ("LODR");
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 **(Not Applicable to listed entity during 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 **(Not Applicable to listed entity during review period)**;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not Applicable to listed entity during review period)**;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not Applicable to listed entity during review period)**;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not Applicable to listed entity during review period)**;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulation");



YOGESH D. DABHOLKAR & Co.
COMPANY SECRETARY

(i) The 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, 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)	Regulation 24(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The procedural formality of filing of necessary form and documents by the unlisted overseas subsidiary with the requisite local authorities relating to appointment of Independent Director on the Board of unlisted material subsidiary incorporated outside India is yet to be completed.	The formality relating to filing of Form and documents of the unlisted overseas subsidiary with the requisite local authorities in Dubai towards the appointment of one of the independent director of the Listed entity on the Board of Asian Star DMCC, unlisted material subsidiary incorporated outside India of the Listed entity is in process and is yet to be completed.



YOGESH D. DABHOLKAR & Co.
COMPANY SECRETARY

- (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) There were no 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.
- (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
	The listed entity was in process of filing necessary documents with requisite local authorities towards appointment of one of the independent director of the Company on the Board of Asian Star DMCC which is unlisted material subsidiary of the Company however due to imposition of lock down because of pandemic of	31/03/2020	Due to spread of COVID-19 across the world and restrictions imposed on the movements of people the listed entity is yet to complete the formalities relating to filing of documents and forms with requisite local authorities towards the appointment.	Action taken by Listed entity is Satisfactory



YOGESH D. DABHOLKAR & Co.
COMPANY SECRETARY

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
	COVID-19 the formalities for the same could not be completed and are in process.			

For Yogesh D. Dabholkar & Co.,
Practicing Company Secretary



YDabholkar

Yogesh D. Dabholkar
Proprietor
FCS No. 6336
CP No. 6752

Place: Dombivli
Date: 30th June, 2021.
UDIN: F006336C000550099.

Note:

Due to restricted movement amid COVID-19 pandemic, we conducted the secretarial Audit by examining the Secretarial Records including Minutes, Documents, Registers and other records etc., and some of them received by way of electronic mode from the Company and could not be verified from the original records. The management has confirmed that the records submitted to us are the true and correct.