

CASTEX TECHNOLOGIES LIMITED

(Formerly Known as AMTEK INDIA LIMITED)

Corporate Office: 3 LSC Pamposh Enclave, Greater Kailash-I, New Delhi-110048

Tel: +91-11-42344444 **Fax:** +91-11-42344400

E-mail: info@castextechnologies.com; **Web:** www.amtek.com

CIN: L65921HR1983PLC033789

Ref No.: CTL/BSE/NSE/2021-22

Date: June 30, 2021

To, The Manager Listing Department BSE Limited, Phiroze Jee Jee Bhoy Towers, Dalal Street, Mumbai – 400001 Scrip code: 532282	To, The Secretary, The National Stock Exchange of India Limited, “Exchange Plaza”, 5th Floor, Plot No. C/1, G-Block, Bandra – Kurla Complex, Bandra (E), Mumbai-400051 Symbol: CASTEXTECH
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Subject: Annual Secretarial Compliance Report for the financial year ended March 31st, 2021.

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended by SEBI (Listing Obligations and Disclosure Requirements)(Second Amendment) Regulations, 2021 dated 5th May 2021, read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 8th February 2019, Please find enclosed herewith the Annual Secretarial Compliance Report issued by Mr. Mukul Dusad, partner of M/s Mukul Dusad and Associates, Practicing Company Secretaries, for the financial year ended March 31, 2021.

Kindly take the same on records.

Thanking You,
Yours faithfully,

For CASTEX TECHNOLOGIES LIMITED



Divya Rijwani

Company Secretary

**Issued with Approval of Mr. Dinkar Tiruvannadapuram Venkatasubramanian
(Insolvency Professional)**

IP Registration No. IBB/PA-001/IP-P00003/2016-17/10011

(Corporate Insolvency Resolution Process was initiated against Castex Technologies Limited under the Insolvency and Bankruptcy Code 2016. Its affairs, business and assets are being managed by the Interim Resolution Professional, Mr. Dinkar T. Venkatasubramanian, appointed by the National Company Law Tribunal vide order dated 20th December, 2017, w.e.f., 22nd December, 2017 and continued as Resolution Professional by the Committee of Creditors in its meeting held on 12th January, 2018. Further Mr. Dinkar T. Venkatasubramanian appointed as Insolvency Professional under the directions of Implementation and Monitoring Committee of the Corporate Debtor, as per the Resolution Plan approved by Hon'ble National Company Law Tribunal by order dated 15th December 2020 under the provisions of the Code.)

Enclosed: As Stated above

Registered Office:

Village Narsinghpur Mohammadpur, Old
Manesar Road Gurgaon Haryana-123106

Tel.: +91-124- 4085851

Email Id.: info@castextechnologies.com

Web: www.amtek.com

Mukul Dusad & Associates

Practicing Company Secretaries

Reg. Office: H-5-C Todarmal Marg Banipark, Jaipur 302016 (Raj.)

Tel: 141-2200506; (m) +91-8824788108; E-mail: mukuldusad@gmail.com

SECRETARIAL COMPLIANCE REPORT OF CASTEX TECHNOLOGIES LIMITED for the year ended 31st March 2021

To,
Mr, Dinkar T. Venkatasubramanian(Insolvency Profession)
(IP Registration No. IBBI/IPA-001/IP-P00003/2016-17/10011)
Castex Technologies Limited
CIN: L65921HR1983PLC033789
Vill.Narsinghpur,Mohammadpur,Old Manesar Road Gurgaon HR 122001

I Mukul Dusad, Practicing Company Secretary of Mukul Dusad & Associates have examined:

- (a) All the documents and records made available to us and explanation provided by Castex Technologies 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,

(Note: Due to the COVID-19 Second Wave pandemic developed rapidly into a global crisis forcing governments to enforce lock-downs of all economic activity. Due to such Lock-down it becomes unfeasible to verify the documents physically and the documents for verification were made available by the company through digital media as much as possible.)

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: -



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- (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; **Not Applicable**
- (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 as the Company has not bought back any of its securities during the period under Review.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 31(1)(b) of SEBI (Listing Obligation and Disclosure Requirement), Regulation, 2015 for Shareholding Pattern for Quarter ending September, 2020	Originally filed as on 20/10/2020 but later revised as on 11/11/2020.	Revised and uploaded on Exchange as on 11/11/2020
2.	Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011 for Annual Disclosure encumbered shares by promoters for the F.Y. ending 31 st March,	Delay of 4 Days	Submitted as on 04/06/2020. However it is a Promoter Compliance not Company Disclosure.



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	2020.		
3.	Annual General Meeting for the F.Y. 2019-20 held after the Due date i.e. 31/12/2020	Delay of 2 months in Convening the Annual General Meeting of the Company and all its allied Compliances.	The Annual General meeting held as on 19/02/2021
4.	Clarification regrading quick result submitted to the exchange dated 31-07-2020	Clarification submitted	Clarification has been Submitted.
5.	Regulation 27(2) of SEBI (Listing Obligation and Disclosure) Regulation, 2015 for the Corporate Governance Report for the Quarter ended March 30, 2020	Due to error in the XBRL the report was Submitted through mail within time as prescribed. After the Matter got resolved the Submission were made as on 21/05/2020 on NSE and 29/05/2020 on BSE. Penalty imposed by NSE.	Penalty has not been paid but CG report submitted
6	Regulation 23(9) of SEBI (LODR) Regulations, 2015 for the Relative Party Transaction for the Half Year ended September 30, 2020	Fine of Rs. 2,06,500 was Imposed by NSE Fine of Rs. 2,06,500 was Imposed by BSE	The Related Party Transaction submitted as on 20/01/2021

- 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 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:



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Sr. No	Action Taken by	Details of Violation	Details of action taken	Observation s/ remark of the Practicing Company Secretary, if any
1.	Stock Exchange	Notice for non-compliance of Listing Regulation 27(2) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 vide Letter No. NSE/LIST-SOP/REG-27/FINES/100854	Due to error in the XBRL the report was Submitted through mail within time as prescribed. After the Matter got resolved the Submission were made as on 21/05/2020 on NSE and 29/05/2020 on BSE. Penalty imposed by NSE.	Penalty has not been paid but CG report submitted
2.	Stock Exchange	Notice for non-Compliance with Regulation 34 of SEBI (LODR) Regulations, 2015	Fine of Rupees 68,440 was imposed by NSE. Fine of Rupees 68,440 was imposed by NSE.	The Annual Report Submitted as on 25/01/2021
3.	Stock Exchange	Notice for non-Compliance with Regulation 23(9) of SEBI (LODR) Regulations, 2015	Fine of Rs. 2,06,500 was Imposed by NSE Fine of Rs. 2,06,500 was Imposed by BSE	The Related Party Transaction submitted as on 20/01/2021



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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.	Clause 35(1)(a) and (b) of the listing Agreement	Adjudication Proceeding u/s 23H of SCRA 1956 read with Section 21 of SCRA, 1956	Fine imposed of Rs. 500,000	Proceedings are under process.
2.	Ministry of Corporate Affairs Serious Fraud Investigation Office	Letter no. SFIO/INV/CTL/1162/2019/I/18579/2019 has been issued	Representation has been made by the company	The matter is under process.

Note: Castex Technologies Limited was under Corporate Insolvency Resolution Process under the Insolvency and Bankruptcy Code 2016 (Code) vide an order of the Hon'ble National Company Law Tribunal ("NCLT"), Chandigarh dated 20.12.2017 and Mr. Dinkar T. Venkatasubramanian (IP Registration no. IBBI/IPA-001/IP-P00003/2016-17/10011), was appointed as the Insolvency Resolution Process ("IRP") with effect from 22nd December 2017. Further, in terms of the provisions of the Code, the Committee of Creditors (COC) in its meeting held on 12th January 2018 continued to Mr. Dinkar T. Venkatasubramanian as the Resolution Professional. The powers of the Board stands suspended as per Section 17 of the Code and such powers are being exercised by Resolution Professional.



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Further The Resolution Plan submitted by Deccan Value Investor LLP together in consortium with Deccan Value P.E. Mauritius ("Successful Resolution Applicant") was approved by the CoC. The Resolution Plans submitted by the Resolution Applicant had been Approved vide an order of the Hon'ble National Company Law Tribunal ("NCLT"), Chandigarh dated 15.12.2020 and subsequently, an Implementation & Monitoring Committee (IMC) formed as per the terms of the approved Resolution Plan for its implementation. According to which Mr. Dinkar T. Venkatasubramanian shall act as Insolvency professional of the Company under the guidance of Implementation & Monitoring Committee (IMC). Currently, the Implementation & Monitoring Committee (IMC) of Castex is looking after the Company as a going concern.

For Mukul Dusad and Associates
Company Secretary



Mukul Dusad
Practicing Company Secretary
CP. No. 22589
Membership No. A60067

UDIN: A060067C000520285

Date: 26/06/2021

Place: Jaipur