



**VIKAS ECOTECH LTD.**

(A NSE/ BSE Listed Company)

CIN : L65999DL1984PLCO19465

Web : [www.vikasecotech.com](http://www.vikasecotech.com)

Email : [info@vikasecotech.com](mailto:info@vikasecotech.com)

Tel. : +91-11-431 44444

May 30, 2024

*Listing Compliance Department*

**National Stock Exchange of India Limited.**

Exchange Plaza,

Bandra-Kurla Complex,

Bandra (E), Mumbai 400051

*Listing Compliance Department*

**BSE Limited.**

Phirozee Jeejeebhoy

Towers, Dalal Street, Fort,

Mumbai - 400 001

**NSE Symbol: VIKASECO**

**Scrip Code: 530961**

**Sub: Annual Secretarial Compliance Report for the year ended March 31,2024 as per Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 ("Listing Regulation")**

Dear Sir/ Madam,

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) read with the relevant Circular(s) issued by SEBI/Exchanges from time to time, please find attached herewith the Annual Secretarial Compliance Report of the Company, issued by a Company Secretary in practice issued in the prescribed form for the year ended March 31, 2024.

We request you to take this on record and to treat the same as compliance with the applicable provisions of the Listing Regulations.

Thanking you,

*for Vikas Ecotech Limited*

Digitally signed  
by RAJEEV KUMAR

Rajeev Kumar  
Executive Director  
DIN: 10271754

Regd. Office : Vikas House, 34/1, Vikas Path, East Punjabi Bagh, New Delhi - 110026

Factory I : G-24 To G-30 And F-7 and F-8, Vigyan Nagar, RIICO Industrial Area, Shahjahanpur, Dist. Alwar, Rajasthan - 301706

Factory II : 143, Prakash Industrial Estate, Sahibabad, Dist. Ghaziabad, Uttar Pradesh – 201005



**SECRETARIAL COMPLIANCE REPORT**  
**VIKAS ECOTECH LIMITED**  
**FOR THE YEAR ENDED MARCH 31, 2024**

The Members,  
**Vikas Ecotech Limited**  
34/1, Vikas Apartment,  
East Punjabi Bagh  
West Delhi, Delhi-110026

We, Kumar G & Co, *Company Secretaries* have conducted the Secretarial Compliance Audit of the applicable SEBI Regulations and the circulars/ guidelines issued thereunder for the period ended March 31, 2024 of Vikas Lifecare Limited (“the listed entity”).

The audit was conducted in a manner that provided us a reasonable basis for evaluating the statutory compliances and expressing our opinion thereon.

We have examined:

- a) all the documents and records made available to us and explanation provided by 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 March 31, 2024 (“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 (Buyback of Securities) Regulations, 2018;\*
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;\*
- 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 Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- j) 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.

**\*Not Applicable to the period under review as there is no such transaction**

We hereby report that, during the review period the compliance status of listed entity is appended as below:



S. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS
1	<p><b>Secretarial Standards:</b></p> <p>The Compliances of the Listed Entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable</p>	Yes	Nil
2	<p><b>Adoption and timely updation of the Policies:</b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>• All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes Yes	Nil Nil
3	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>• The Listed Entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/information under a separate section on the website</li> </ul> <ul style="list-style-type: none"> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website</li> </ul>	Yes* Yes*  Yes*	The company has been advised to timely upload the data on website as per Regulation 46 & 62 of SEBI (LODR) Regulations, 2015.  Nil
4	<p><b>Disqualification of Director:</b></p> <p>None of the Director(s) of the Company are disqualified under Section 164 of the Companies Act, 2013 as confirmed by the Listed Entity</p>	Yes	Nil
5	<p><b>Details related to Subsidiaries of Listed Entities have been examined w.r.t.:</b></p> <p>(a) identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	No  Yes	Company has wholly owned subsidiary companies named M/s. Vikas Organics Private Limited and M/s Shamli Steels Private Limited, but it doesn't fall under the definition of material subsidiary company.  Nil
6	<p><b>Preservation of Documents:</b></p> <p>The Listed Entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per policy of Preservation of Documents and Archival policy prescribed under SEBI (LODR) Regulations</p>	Yes	Nil



7	<b>Performance Evaluation :</b> The Listed Entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations	Yes	Nil
8	<b>Related Party Transactions:</b> (a) The Listed Entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The Listed Entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.	Yes  Yes	Nil  Nil
9	<b>Disclosure of events or information:</b> The Listed Entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder except as provided under separate paragraph herein	Yes	Nil
10	<b>Prohibition of Insider Trading:</b> The Listed Entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	Nil
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No Action(s) has been taken against the Listed Entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein	Yes	Nil
12	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc except as provided under separate paragraph herein	Yes	Nil

\* with some delays and omissions, which were advised for correction during the audit process

**Compliances related to resignation of Statutory Auditors from Listed Entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019:**

S. No.	Particulars	Compliance Status (Yes/ No/NA)	Observations/ Remarks by PCS
1	<b>Compliances with the following conditions while appointing/re-appointing an auditor</b>		
	i) If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or  ii) If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or  iii) If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation has issued the limited review/ audit report	NA	No instance of resignation of statutory auditors during the year under report





	es including specific clause)				warnings etc				
1.	SEBI (LODR), 2015	Regulation 30	Trading activities by certain entities in the scrip of "Vikas Ecotech Limited."	SEBI	Imposition of penalty via Adjudication Order No. Order/S/S/RK/2023-24/28342-28349] dated July 27, 2023	SEBI passed an order in the matter of trading activities by certain entities in the scrip of "Vikas Ecotech Limited."	Penalties of aggregate amount of Rs. 15,00,000 were imposed on persons belonging to promoter/promoter group, under Section 15A(b) of the SEBI Act, 1992	Company has been advised to be cautious of the SEBI (PIT) provision.	Penalties have been paid by the respective Noticees within due timelines and also been reported to Stock Exchanges
2.	SEBI (LODR), 2015	Regulation 23(9)	Delay in filing with Stock Exchange	BSE Limited	Imposition of Fine	BSE had imposed fine amounting to Rs. 5,000/- for delay of 1 day in submission of Related Party Transaction	Fine amounting to Rs. 5,000/- by BSE Limited	No comment required.	Company has paid the imposed fine on 15.07.2023
3.	SEBI (LODR), 2015	Regulation 32 (1) & (2)	Non-filing of Statement of Deviation or Variation	SEBI	Administrative warning letter bearing reference no. SEBI/HO/CFD/SEC-5/OW/P/2024/12996/1 dated April 2, 2024	The company received an administrative warning letter from SEBI on April 2, 2024 to adhere to Regulation 32 (1) & (2)	-	The company has been advised to submit such statement on immediate basis.	Company shall take necessary steps in filing such statement.
4.	SEBI	SEBI vide order No.	-	SEBI	SEBI believes	SEBI has appointed	No fine or penalty was	-	Company has



Act, 1992	SEBI/HO/CFID-SEC6/P/O W/2024/4196/1 dated January 30, 2024				that the business transactions of the Company have not been properly dealt with in financial information disclosures	Forensic Auditor w.r.t. the financial years ending March 31, 2019, March 31, 2020, March 31, 2021 and March 31, 2022.	imposed so far, as SEBI ordered Forensic Audit is underway		disclosed this Forensic Auditor appointment u/r 30 of SEBI (LODR) Regulations and is submitting the document asked by the Forensic Auditors
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b) The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	Compliance requirement (Regulations/circular/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of action i.e. Advisory/Fine/Show cause notice/warnings etc	Details of violations	Fine Amount	Observations /Remarks by PCS	Management Response
-	-	-	-	-	-	-	-	-	-

**Assumptions & Limitation of scope and Review:**

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.



**KUMAR G & CO.**

*Company Secretaries*

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80/37A, First Floor, Malviya Nagar, New Delhi – 110017 | kumargpankaj@gmail.com | +011 4050 3037

*For KUMAR G & Co.  
Company Secretaries*

PANKAJ  
KUMAR  
GUPTA

Digitally signed by  
PANKAJ KUMAR  
GUPTA  
Date: 2024.05.30  
17:30:38 +05'30'

GUPTA P. K.  
M.No. : A14629 | CP : 7579  
UDIN: A014629F000502811

Date : May 30, 2024  
Place: New Delhi