



# VIRAT CRANE INDUSTRIES LTD.,

D.No. 25-18-54, Opp. CRANE BETEL NUT POWDER WORKS OFFICE, Main Road,  
Sampathnagar, GUNTUR - 522 004, Phone : 0863 - 2223311  
Email : vcil@cranegroup.in CIN No : L74999AP1992PLCO14392

To,  
The General Manager,  
BSE Limited,  
PJ Towers, Dalal Street,  
Mumbai,-400001

Date: 29-06-2021

Sub: Submission of Annual Secretarial Compliance Report for the financial year ended on 31st March, 2021 as per Regulation 24A of SEBI (LODR) Regulations, 2015.

Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015, please find the enclosed Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2021 issued by Practicing Company Secretary CS.N.V.S Nagaraju, ( ACS -37767 ; COP No. 14940) Partner of K. Srinivasa Rao & Nagaraju Assocoates, Vijayawada.

Kindly take the same on record.

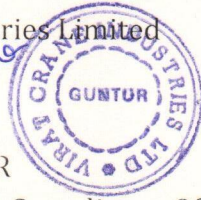
Thanking You,

For Virat Crane Industries Limited

*R. Adi Venkata Rama.R*

CS Adi Venkata Rama.R

(Company Secretary & Compliance Officer)





**ANNUAL SECRETARIAL COMPLIANCE REPORT OF VIRAT CRANE INDUSTRIES LIMITED  
FOR THE YEAR ENDED 31.03.2021**

To

**M/s VIRAT CRANE INDUSTRIES LIMITED,**  
D.No:25-18-54,Opp:Crane Betel Nut Powder works ,  
Main road,Sampath Nagar,  
Guntur.

We K.SrinivasaRao& Naga Raju Associates. Company Secretaries, Vijayawadahave examined:

(a) all the documents and records made available to us and explanation provided by **M/s VIRAT CRANE INDUSTRIES LIMITED(CIN:L74999AP1992PLC014392 )**("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 **31.03.2021** ("Review Period" i.e 01.04.2020 to 31.03.2021) 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: **Not Applicable as there was no reportable event during the financial year under review**

(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 there was no reportable event during the financial year under review**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable as there was no reportable event during the financial year under review**

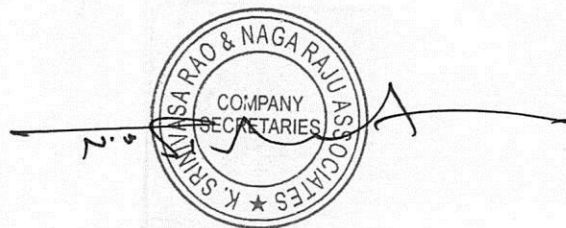
(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable as there was no reportable event during the financial year under review**

(g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations,2013; **Not Applicable as there was no reportable event during the financial year under review**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) other regulations as applicable and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the covid-19 Pandemic situations, 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:

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation: 33 (1) (d) of the SEBI(LODR) Regulations,2015.The listed entity shall ensure that the limited review or audit reports submitted to the stock exchange(s) on a quarterly or annual basis are to be given only by an auditor who has subjected himself to the peer review process of Institute of Chartered Accountants of India and holds a valid certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India	<b>The Company did not ensure that the limited review or audit reports submitted to the stock exchange(s) on a quarterly or annual basis were given by an auditor who has subjected himself to the peer review process of ICAI and holds a valid certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India.</b>	The company has not complied the Regulation: 33 (1) (d) of the SEBI (LODR) Regulations, 2015 for a period up to 17.08.2020.
2.	Regulation 30 (2) Schedule III Part A (7) of The SEBI(LODR) Regulations, 2015 Disclosures Of Events The following shall be events/information, upon occurrence of which listed entity shall make disclosure to stock exchange (7).Change in directors, key managerial personnel ( Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), Auditor and Compliance Officer.	<b>The Company has make disclosure to stock exchange about the appointment of a Non Executive Director at the Board Meeting held on 20.04.2020 with delay.</b>	The Company has not make disclosure to stock exchange Upon occurrence of the event of appointment of a Non-Executive Director.



(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/our 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

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.
-NIL-				

(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.	The company has not complied the Regulation: 33 (1) (d) of the SEBI (LODR) Regulations, 2015	31.03.2020	The company has complied with Regulation: 33 (1) (d) of the SEBI (LODR) Regulations, 2015 with effect from 18.08.2020	The company has complied with Regulation: 33 (1) (d) of the SEBI (LODR) Regulations, 2015 from 18.08.2020

This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.

Place: Vijayawada  
Date: 26.06.2021

For K.SrinivasaRao & Naga Raju Associates  
Company Secretaries



*[Handwritten Signature]*  
CS. Naramsetti Venkata Siva Naga Raju  
Partner  
ACS: 37767 C P No.: 14940  
UDIN: A037767C000520964



**ANNEXURE**

To  
**M/s VIRAT CRANE INDUSTRIES LIMITED**  
D.No:25-18-54,Opp:Crane Betel Nut Powder works ,  
Main road,Sampath Nagar,  
Guntur.

The Secretarial Compliance Report of even date is to be read along with this letter.

1. Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made thereunder and Regulations, circulars and guidelines issued thereunder by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.

2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed, provide a reasonable basis for our opinion.

3) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity

4) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.


5) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.

6) The Secretarial Compliance Report 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.

Place: Vijayawada  
Date: 26.06.2021

For K.SrinivasaRao & Naga Raju Associates  
Company Secretaries



  
CS. Naramsetti Venkata Siva Naga Raju  
Partner  
ACS: 37767 C P No.:14940