

# VAMA INDUSTRIES LIMITED



**Registered Office :** Ground Floor, 8-2-248/1/7/78/12, 13, Block -A, Lakshmi Towers, Nagarjuna Hills, Punjagutta, Hyderabad - 500 082, Telangana, India. Ph : +91-40-6684 5534, 6661 9919, 6661 5534, Fax : +91-40-2335 5821.  
CIN: L72200TG1985PLC041126, E-mail: services@vamaind.com, Website: www.vamaind.com

Date: 30.05.2022

To  
Department of Corporate Services  
BSE Limited  
Phiroze Jeejebhoy Towers  
Dalal Street  
Mumbai – 400 001

Dear Sir,

**Sub: Submission of Secretarial Compliance Report under Regulation 24A of SEBI (LODR) Regulations, 2015**

**Ref: Scrip code: 512175**

Please find enclosed herewith Secretarial Compliance Report for the Financial year ended 31<sup>st</sup> March, 2022 as per Regulation 24A of SEBI (LODR) Regulations, 2015 and in compliance with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019.

This is for your information and records.

Thanking you,

For Vama Industries Limited

*Atchyuta R. Raju*

**Atchyuta Rama Raju Vegesna**  
**Managing Director**  
**DIN: 00997493**



**Secretarial Compliance Report**  
of  
**VAMA INDUSTRIES LIMITED**  
For the Financial Year ended 31.03.2022

We, P S Rao & Associates, Company Secretaries , Hyderabad have examined:

- (a) all the documents and records made available to me and explanations provided by **VAMA INDUSTRIES LIMITED**, having its Registered Office at Door No. 8-2-248/1/7/78/12,13,Ground Floor, Block-A, Lakshmi Towers, Nagarjuna Hills, Punjagutta Hyderabad, 500082 hereinafter referred to as "**the listed entity**"
- (b) the filings/ submissions made by the listed entity to the Stock Exchange,
- (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 31.03.2022 ("01.04.2021 to 31.03.2022") 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - **Not Applicable during the audit period**
- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - **Not Applicable during the audit period**
- (f) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - **Not Applicable during the audit period**
- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not Applicable during the audit period**
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - **Not Applicable during the audit period**
- (i) The Depositories Act, 1996;
- (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; and circulars/ guidelines issued thereunder;

and based on the above examination, 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
01	Regulation 6(1) SEBI (Listing Obligation and Disclosure Requirements), Regulation 2015. Action under SEBI circular No.SEBI/HO/CMD/CIR/P/2020/12, dated January, 22,2020	Alleged violation of Regulation 6(1) of SEBI (LODR), Regulations, 2015. Reminder to freeze promoters demat accounts in view of nonpayment of fine. Subsequently the promoters demat accounts were frozen.	Upon explanation provided by the Company, the demat accounts were unfrozen.

- (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 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 Eg. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	BSE	Regulation 6(1) SEBI (Listing Obligation and Disclosure Requirements), Regulation 2015. Action under SEBI circular No. SEBI/HO/CMD/CIR/P/2020/12, dated January, 22, 2020	Reminder to freeze promoters demat accounts in view of nonpayment of fine. Subsequently the promoters demat accounts were frozen.	Upon explanation provided by the Company, the demat accounts were unfrozen.

**Note :** Apart from the aforesaid, the Company received e mail from BSE communicating some discrepancy in Shareholding Pattern for the quarter ended 31<sup>st</sup> December, 2021 and requesting the Company to upload the rectified XBRL, in case of any change as observed. Since, there was no change, no revised uploading was done at Company's end.

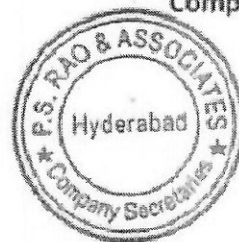
- (d) The Listed entity has taken the following actions to comply with the observations made in previous reports:

Sr No.	Observations of the practicing Company secretary in The previous reports	Observation made in the Secretarial Compliance Report for the year ended	Action taken by the listed entity if any	Comments of the practicing Company secretary on the action taken by the listed entity

1.	<p>Non-compliance of Regulation 17(2A) of SEBI (LODR) Regulations, 2015 while filing the Report on Corporate Governance for the quarter ended 30.09.2020.</p> <p>The company made a request to BSE for waiver of fine imposed for the alleged non compliance. The said waiver request was approved by the BSE and the communication of such waiver was made to the Company on 07.05.2021.</p>	2020-21	The waiver request was approved by the BSE.	No further comments, since the fine was waived by BSE.
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- e. The Listed entity has duly complied with the conditions specified under para 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019, dated October 18, 2019, by suitably modifying the terms of appointment of the auditor during the previous year, i.e. FY 2019-20.

For P S Rao & Associates  
Company Secretaries



*Vikas*  
Vikas Sirohiya  
Partner  
C.P. No:5246  
M. No.15116

UDIN: A015116D000437681  
Peer Review No.P2001TL078000

Place: Hyderabad  
Date: 30.05.2022