



# VIKAS ecOTECH LTD.

Ph.: +91-1143144444 • Email : info@vikasecotech.com • Website : www.vikasecotech.com • CIN -L65999DL1984PLC019465

June 29, 2021

Listing Compliance Department  
National Stock Exchange of India Limited.  
Exchange Plaza, Bandra-Kurla Complex,  
Bandra (E), Mumbai 400051  
Fax: 022-26598235/36

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, 2021 as per Regulation 24A of SEBI (Listing Obligation And Disclosure Requirements ) Regulations, 2015("Listing Regulations")

Dear Sir/ Madam,

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1//27/2019 Dated February 8, 2019 please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2021.

The above information is also available on the company's website at [www.vikasecotechlimited.com](http://www.vikasecotechlimited.com).

We request you to kindly take the above information on record and oblige.

Thanking you,

Yours Faithfully,  
for Vikas Ecotech Limited

Prashant Sajwani  
Company Secretary



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

Plant : G-24-30, Vigyan Nagar, RIICO Indl. Area, Shahjahanpur, Distt. Alwar-301 706 (Raj)

Plant : SDF J-06, Noida Special Economic Zone (N.S.E.Z.), Noida Dadri Road, Phase-II, Noida-201305 (U.P.)

# **KUMAR G & Co.**

*Company Secretaries*

80/37A, First Floor, Near Bhagat Singh Park

Malviya Nagar, New Delhi 110017

kumargpankaj@gmail.com | +91 11 4050 3037

## **SECRETARIAL COMPLIANCE REPORT OF VIKAS ECOTECH LIMITED**

### **FOR THE YEAR ENDED MARCH 31, 2021**

We have examined:

- a) all the documents and records made available to us and explanation provided by **M/s. Vikas Ecotech 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 March 31, 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;
- 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) Regulations, 2014;\*
- 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) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares), Regulations, 2013;\*
- j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- k) 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:

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- 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 29 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	<p>The Company has not given advance notice of 5 days (excluding the date of the intimation and date of the meeting) to the Exchange intimating about the board meeting held on January 23, 2021.</p> <p>Though the Company claimed that notice was shorter by 1 day only due to some technical glitches, BSE and NSE advised the Company to pay a fine of Rs.10,000/- which was subsequently paid. .</p>	<p>The Company has paid the fine advised by the Stock Exchanges, within due timeline.</p> <p>Hence, no comment is required.</p>

- 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:



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Sr.No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Regulation 74(5) of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	The Company obtained the requisite certificate from its RTA, but the same was not submitted to the Stock Exchanges.	Post FY 2019-20, the Company is regular in submitting the requisite certificate (received from RTA) to the Stock Exchanges.	The Company is now complying with the requirement; hence no comment is required.
2	Regulation 23(9) of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015)	Delay in filing of disclosure of Related Party transactions	The Company had made the disclosure on the stock exchanges on December 18, 2019 (which was required to be submitted latest by December 13, 2019).	The Company made the necessary compliance though with some delay, hence no comment is required.

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

Note:

- Provide the list of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations.
- Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/ observations.

*for* **KUMAR G & Co.**  
*Company Secretaries*

GUPTA P. K.  
ACS : 14629 | CP : 7579  
UDIN: A014629C000538801

Date : June 29, 2021  
Place : New Delhi