

May 29, 2019

To,
Department of Corporate Services,
BSE Limited
Ground Floor, P.J.Tower,
Dalal Street, Fort,
Mumbai- 400001

BSE Script Code: 541735

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2019
Ref.: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019

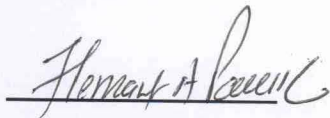
Please find enclosed herewith Annual Secretarial Compliance Report issued by Ishit Vyas & Co.,
Practicing Company Secretaries pursuant to SEBI Circular No. CIR/CFD/CMDI/27/2019 dated
February 8, 2019;

You are requested to take the same on your record.

Thanking you,

Yours Faithfully,

For, Vivanta Industries Limited



Managing Director

Name: Parikh H.A.

DIN: 00027820

Encl: As above

CIN : U74110GJ2013PLC075393

**SECRETARIAL COMPLIANCE REPORT OF VIVANTA INDUSTRIES LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2019**

We, Ishit Vyas & Co., Practicing Company Secretaries, have examined:

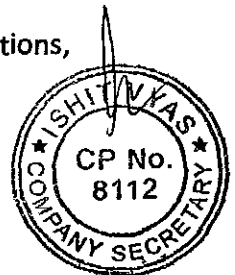
- (a) all the documents and records made available to us and explanation provided by Vivanta Industries Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity i.e. www.vivantaindustries.com
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2019 ("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 (**Not Applicable to the listed entity during the Review Period**);



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not Applicable to the listed entity during the Review Period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not Applicable to the listed entity during the Review Period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not Applicable to the listed entity during the Review Period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- and circulars/ guidelines issued thereunder;

Based on the above examination, we hereby report that, during the Review Period:

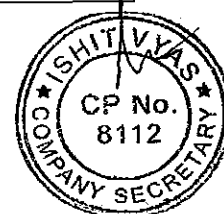
- (a) The listed entity has complied with the provisions of the above Regulations and circulars / guidelines issued thereunder, except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations / Circulars / Guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
1.	Non Submission of Corporate Governance Report as per Regulation 27 (2) SEBI (LODR) Regulations, 2015 within time prescribed	Corporate Governance report filed on 16.01.2019 i.e. one day after the due date	Delay was for one day and Company made compliance.
2.	Non Compliance of Regulation 29 of SEBI (LODR) Regulations, 2015 i.e. prior intimation of Board Meeting of the company to BSE	Company has intimated BSE on 05.02.2019 for the Board Meeting to be held on 08.02.2019	The Company paid the fine imposed on it and made the compliance.



- (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 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.
1	BSE	Non Submission of Corporate Governance Report as per Regulation 27 (2) SEBI (LODR) Regulations, 2015 within time prescribed	Fine for amounting to Rs.2360/- was not paid within prescribed time frame and thus promoter and promoter group demat accounts were freezed.	It is observed that promoter and promoter group demat accounts were freezed due to non-payment of penalty within time prescribed. However upon the compliance made good, the accounts were unfreezed.
2	BSE	Non Compliance of Regulation 29 of SEBI (LODR) Regulations, 2015 i.e. prior intimation of Board Meeting of the company to BSE	Fine amounting to Rs.11,800/- was levied.	The Company paid fine of Rs.11,800/- within time prescribed and compliance made good.



- (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 (the years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: Ahmedabad

Date: 28.05.2019

For, Ishit Vyas & Co.
Company Secretaries



A handwritten signature in black ink, appearing to read "Ishit Vyas", written over a horizontal line.

Ishit Vyas

Proprietor

M. No.: FCS 7728

C. P. No.: 8112