

Parinee Crescenzo, "A" Wing, 1102, 11th Floor,  
"G" Block, Plot No. C38 & C39,  
Behind MCA, Bandra Kurla Complex,  
Bandra (E), Mumbai - 400 051, India.  
Phone : 91-22-6124 0444 / 6124 0428  
Fax : 91-22-6124 0438  
E-mail : [vinati@vinatiorganics.com](mailto:vinati@vinatiorganics.com)  
Website : [www.vinatiorganics.com](http://www.vinatiorganics.com)  
CIN : L24116MH1989PLC052224



**VOL/MUM/MW/392**

May 13, 2019

**The Stock Exchange, Mumbai**  
(Listing Department)  
P. J. Towers, 1<sup>st</sup> Floor,  
Dalal Street, Mumbai – 400 001.

**Scrip Code: 524200**

**National Stock Exchange of India Ltd.**  
Listing Department,  
Exchange Plaza,  
Plot No. C/1, 'G' Block,  
Bandra-Kurla Complex,  
Bandra (East), Mumbai – 400 051.

**NSE Symbol: VINATORGA / Series: EQ**

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2019.**

In terms of clause 3 (b) (iii) of SEBI Circular No.: CIR/CFD/CMD1/27/2019 dated February 8, 2019, we submit herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2019, issued by Practicing Company Secretary.

Kindly take note of the same.

Thanking you,

Yours faithfully,  
For **Vinati Organics Limited**

A handwritten signature in blue ink, appearing to read 'Milind Wagh', is written over a faint, larger version of the same signature.

**Milind Wagh**  
Company Secretary/Compliance Officer

Encl: As above

**Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2019**

TO,  
VINATI ORGANICS LIMITED  
B-12 & B-13, MIDC AREA,  
MAHAD, DIST: RAIGAD,  
MAHARASHTRA

We, VKM & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **Vinati Organics 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 31<sup>st</sup> 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;
- (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;

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: - **No deviations observed**

<i>Sr No</i>	<i>Compliance Requirements (Regulations/Circulars/Guidelines including specific clauses)</i>	<i>Deviations</i>	<i>Observations/Remarks</i>
	.....		

(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: **No violation occurred**

<i>Sr No</i>	<i>Action taken by</i>	<i>Details of Violation</i>	<i>Details of Action taken</i>	<i>Comments on the Actions taken by the Company</i>
	.....			



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

<i>Sr No</i>	<i>Observations in the previous Reports</i>	<i>Observations made in the Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2018</i>	<i>Actions taken by the Listed Entity; if any</i>	<i>Comments on the Actions taken by the Company</i>
Not applicable				

Date: 10/05/2019

Place: Mumbai



For VKM & Associates  
Practicing Company Secretary

*(Signature)*  
(Vijay Kumar Mishra)

Partner

FCS No. 5023

CP No.: 4279