

**VISION CORPORATION LIMITED**

2<sup>ND</sup> FLOOR, CITI MALL, NEW LINK ROAD, ANDHERI: WEST, MUMBAI: 400053  
TEL: +91-22-67255361 EMAIL : [INFO@VISIONCORPLTD.COM](mailto:INFO@VISIONCORPLTD.COM)  
WEB: WWW.VISIONCORPLTD.COM

To,  
The Corporate Relationship Manager  
Department of Corporate Services  
BSE Ltd., P J Towers, Dalal Street,  
Mumbai - 400001

**Ref : Scrip Code - 531668**

**Subject : Submission of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup>  
March, 2021**

Dear Sir,

Please find enclosed herewith the Annual Secretarial Compliance Report of practicing company secretary as per Regulation 24A of SEBI (LODR) Regulations, 2015 for the year ended on 31<sup>st</sup> March, 2021.

Kindly take the same on record and acknowledge the receipt.

Thanking you,

Yours faithfully,  
For Vision Corporation Limited



Brijesh Rathod  
Company Secretary and Compliance officer

**SARK AND ASSOCIATES**

Unit No-215, Gundecha Ind Estate, Akurli Road, Near Growels mall, Kandivali:East, Mumbai: 400101

**Secretarial compliance report of Vision Corporation Limited for the year ended  
31<sup>st</sup> March, 2021**

I, Sumit Khanna, partner of SARK & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Vision Corporation 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 31.03.2021 (“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; (*Not applicable during the year under review*)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (*Not applicable during the year under review*)
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (*Not applicable during the year under review*)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (*Not applicable during the year under review*)

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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not applicable during the year under review)*
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013; *(Not applicable during the year under review)*
- (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:-

| Sr. no: | Compliance Requirement (Regulations! circulars! guidelines including specific clause) | Deviations | Observation/remark by Practicing Company Secretaries |
|---------|---|------------|--|
| Nil     | Nil   | Nil        | Nil  |

- (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 | Observation/remark by Practicing Company Secretaries |
|---------|-----------------|----------------------|-------------------------|--|
| Nil     | Nil             | Nil                  | Nil                     | Nil  |

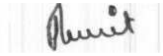
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

| Sr. no: | Observation/remark by Practicing Company Secretaries | Observations made in the secretarial compliance report for the year endeth (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 |
|---------|--|--|--|--|
| Nil     | Nil  | Nil  | Nil  | Nil  |

**For SARK & Associates  
Practicing Company Secretaries**



**Sumit Khanna  
Partner**

**Membership No.: 22135**

**C P No.: 9304**

**Place: Mumbai**

**Date: 29/04/2021**