

Date: 30.06.2021

To,  
BSE Limited  
P. J. Towers, Dalal Street, Fort,  
Mumbai-400001.  
BSE Scrip Code No. 541735

Sub: Annual Secretarial Compliance Report of Vivanta Industries Limited for the Financial Year ended March 31, 2021

Ref.: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019

Dear Sir/Madam,

In compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find attached the Annual Secretarial Compliance Report of Vivanta Industries Limited ("**the Company**") for the Financial Year ended March 31, 2021, issued by Ishit Vyas & Co., Company Secretary, Secretarial Auditors of the Company.

Request you to please take the same on your records.

Thanking you,  
Yours sincerely,

For, Vivanta Industries Limited

*K. A. Parekh*

Kuldip Ashokkumar Parekh  
CFO

PAN: BFDPP4709J

Encl: As above



CIN : L74110GJ2013PLC075393

Secretarial compliance report of Vivanta Industries Limited  
for the Financial Year ended March 31, 2021  
UDIN: F007728C000540700

To,  
The Board of Directors  
Vivanta Industries Limited

I, Ishit Vyas & Co., 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,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the Financial Year ended March 31, 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 as there was no reportable event during the financial year under review;**
- (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 as there was no reportable event during the financial year under review;**



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable as there was no reportable event during the financial year under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable as there was no reportable event during the financial year under review;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;

and based on the above examination, I 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.	Compliance of Regulation 31 of SEBI (LODR) Regulations, 2015 for Shareholding Pattern	Non Compliance of Regulation 31 of SEBI (LODR) Regulations, 2015 There was delay in disclosing Shareholding Pattern i.e. one day after the due date	The Company has initiated steps to avoid such non-compliance
2.	Compliance of Regulation 23(9) of SEBI (LODR) Regulations, 2015. For related party transaction on consolidated basis	Non Compliance of Regulation 23(9) of SEBI (LODR) Regulations, 2015. For related party transaction on consolidated basis i.e. thirteen day after due date	The Company has initiated steps to avoid such non-compliance

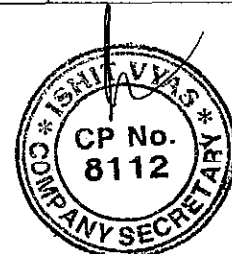


- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ 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 Limited	Regulation 31 of SEBI (LODR) Regulations, 2015	Fine of Rs. 2360/- was imposed on the Company by BSE Limited	The Company has paid the penalty levied and initiated steps to avoid such non-compliance
2.	BSE Limited	Regulation 23(9) of SEBI (LODR) Regulations, 2015	Fine of Rs. 76700/- was imposed on the Company by BSE Limited	The Company has paid the penalty levied and initiated steps to avoid such non-compliance

- (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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Regulation 31 of SEBI (LODR) Regulations, 2015 There was delay in disclosing Shareholding Pattern i.e. one day after the due date	2019-2020	The Company has initiated steps to avoid such non-compliance	No such non compliance was observed during the year under review 2020-2021.

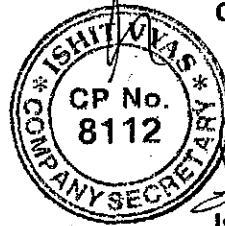


2.	Regulation 23(9) of SEBI (LODR) Regulations, 2015. There was delay in disclosing related party transaction on consolidated basis i.e. thirteen day after due date	2019-2020	The Company has initiated steps to avoid such non-compliance	No such non compliance was observed during the year under review 2020-2021.
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Place: Ahmedabad

Date: 29.06.2021

For, Ishit Vyas & Co.,  
Company Secretaries



Ishit Vyas

M. No.: F7728

C.O.P: 8112

To,

**The Board of Directors**

**VIVANTA INDUSTRIES LIMITED**

**UDIN: F007728C000540700**

The Secretarial Compliance Report of even date is to be read along with this letter.

1. Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made thereunder and Regulations, circulars and guidelines issued thereunder by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.
2. We have followed the audit practices and processes including procedures prescribed for and during COVID-19 period by The ICSI and as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done electronically to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity.
4. Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.
6. The Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**Place: Ahmedabad**

**Date: 29.06.2021**



**For, Ishit Vyas & Co.,  
Company Secretaries**

**Ishit Vyas**

**M. No.: F7728**

**C.O.P: 8112**