



July 31, 2020

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, 2020 as per Regulation 24A of SEBI (Listing Obligations 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, 2020.

The above information is also available on the Company's website at www.vikasecotech.com.

You are requested to take the information on record.

Yours Faithfully,

for Vikas Ecotech Limited

Vikas Garg
Managing Director
DIN: 00255413





MSTR & ASSOCIATES

COMPANY SECRETARIES

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Secretarial Compliance Report of VIKAS ECOTECH LIMITED For the Financial year ended March 31, 2020

We have examined:

- a) all the documents and records made available to us and explanation provided by 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, 2020 (“Review Period”) in respect of compliance with the provisions of:
- e) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- f) 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 Disclosures 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) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;**

(j) 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;

***No event took place under these Regulations during the review period.**

and circulars/ guidelines issued thereunder; 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 there under, except in respect of matters specified below:

S. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 74(5) of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;	Requirement of Submission of Certificate under Regulation 74(5) to the Stock Exchanges i.e. BSE Limited and National Stock Exchange Limited	As per the requirement of Regulation 74(5) Securities And Exchange Board of India (Depositories And Participants) Regulations, 2018, it is required to submit certificate of security from the participants to depository and to every stock exchange where the security is listed with in fifteen days of the receipt of the Certificate. However, we observed that the Company obtained the requisite certificate from its RTA, but the same was not submitted to the Stock Exchanges.
2	Regulation 23(9) of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015)	Delay in filing of disclosure of Related Party transactions	As per the requirement of Regulation 23(9) SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015), listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis, in the format specified in the relevant accounting standards for annual results to the stock exchanges and publish the same on its website. We observed that the Company had its Board Meeting on November 14, 2019 to consider for quarterly and half year results of September 30, 2019 and as such necessary disclosure was required to be submitted by latest by December 13, 2019 and disclosure was submitted by the Company on December 18, 2019.

(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 there under:

S.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.	SECURITIES AND EXCHANGE BOARD OF INDIA (SEBI)	Shri Sumer Chand Tayal being a 'designated person', had executed trades in the scrip of Vikas Ecotech Limited on some of the dates when the trading window was closed and had bought 2300 shares and sold 5500 shares amounting to gross trade value of Rs. 1,39,280/-	SEBI vide [ADJUDICATION ORDER NO. ORDER/AO/GR/KG/2019-20/4924] dated October 14, 2020 had imposed a penalty of Rs. 1,00,000/- (Rupees One Lakh only) on Shri Sumer Chand Tayal, which was paid vide Demand Draft No. "379091" dated 27.11.2019 drawn on 'Central Bank of India'	Since penalty amount has been paid in due compliance with SEBI order, no comment is required.

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

S.No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2019 (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
1.	Irregularity in filling the casual vacancy arise in the office of Independent Director	Casual vacancy in the office of Independent Director on 8th October 2018 and was filed on February 14th, 2019 i.e. by delay of 37 days.	BSE and NSE compounded it and advised to pay a fine @Rs. 5000/- per day for 37 days aggregating to Rs. 185,000/- plus taxes, in terms of SEBI Circular dated May 03, 2018 and the said fine was paid by the Company under protest, within the due timeline.	The Company has paid the penalty under protest within due timeline. Hence, no comment is required.

(Note): 1. 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.

2. 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.

Place: New Delhi
Dated: 31.07.2020

For MSTR & ASSOCIATES
Company Secretaries

TEENA
RANI

Digitally signed by TEENA RANI
DN: cn=RANI, o=Personal,
postalCode=110009, st=DELHI,
serialNumber=9864c4f6b226a8d3d6
b2a2d80ec669936e6d3ecf380c2d51a
9a58d544d51c, cm=TEENA RANI
Date: 2020.07.31 15:25:51 +05'30'

(Teena Rani)
Sole Proprietor
Membership No. 40050
COP No. 21768

UDIN: A040050B000538944