



# VIKAS ECOTECH LTD.

Ph.: +91-1143144444 • Email : info@vikasecotech.com • Website : www.vikasecotech.com • CIN -L65999DL1984PLC019465

VETL/INT/30.05.2019

30.05.2019

<b>The General Manager- Listing</b> National Stock Exchange Limited Exchange Plaza, Bandra- Kurla Complex, Bandra (E), Mumbai 400051.  NSE Symbol: VIKASECO	<b>The General Manager- Listing</b> BSE Limited PhirozeeJeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001.  Scrip Code: 530961
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**Sub: Submission of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2019.**

Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/ CMD1/27/2019 dated 08<sup>th</sup> February, 2018, please find enclosed Annual Secretarial Compliance Report of the Company for the financial year ended 31<sup>st</sup> March 2019.

This is for your information and records please.

Thanking you.

For Vikas EcoTech Ltd.

Preeti Rai

(Company Secretary and Compliance Officer)



Encl: a/a

**Regd. Office :** Vikas House, 34/1, East Punjabi Bagh, New Delhi- 110026 (INDIA)

**Plant 1 :** Industrial Growth Centre, Phase-I, SIDCO Complex, Distt. Samba-187 121 (J&K)

**Plant 2 :** G-24-30, Vigyan Nagar, RIICO Indl. Area, Shahjahanpur, Distt. Alwar-301 706 (Raj)

## MSTR & ASSOCIATES

### Company Secretaries

Off:105 & 302, C-2/4, Pragati Market, Ashok Vihar Phase II, Delhi-110052

Email id: akpoplico@gmail.com Ph. 27431426, 27460196, 9811834710

### Secretarial Compliance Report

of VIKAS ECOTECH LIMITED for the year ended 31<sup>st</sup> March, 2019

We, MSTR & Associates, Company Secretaries, having our office at 105 & 302, C-2/4, Pragati Market, Ashok Vihar Phase II, Delhi-110052 have examined:

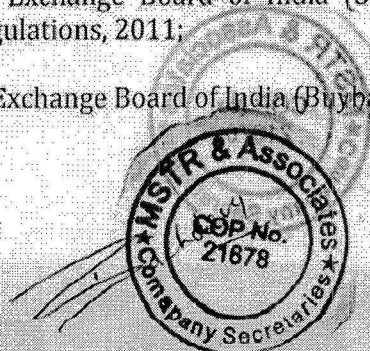
- (a) all the documents and records made available to us and explanation provided by VIKAS ECOTECH LIMITED ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 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\*;





**MSTR & ASSOCIATES**  
**Company Secretaries**

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- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014\*;
- (f) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

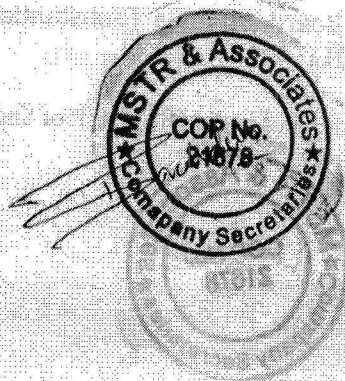
**\*No event took place under these Regulations during the review period.**

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	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 17 (1) read with Regulation 25 (6) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015	Delay in filling of casual vacancy in the office of Independent Director.	Casual vacancy arising in the office of Independent Director on 8 <sup>th</sup> October, 2018 and was filled on 14 <sup>th</sup> February, 2019 i.e. by delay of 37 days.

- (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:



## MSTR & ASSOCIATES

### Company Secretaries

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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.	Action Taken by Stock Exchanges (BSE Limited and National Stock Exchange of India Limited) on the Company	Regulation 17 (1) of SEBI (Listing Obligations And Disclosure Requirements) Regulations 2015	Fine @Rs. 5000/- per day for 37 days aggregating to Rs. 1,85,000/- plus taxes has been levied by BSE Limited and National Stock Exchange of India Limited respectively vide their notices dated May 2, 2019, in terms of SEBI Circular dated May 3, 2018.	The Company has paid the penalty under protest within due timeline.

(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 31 <sup>st</sup> March, 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable - This being the first reporting period since the notification of the requirement to submit the present report.				

We further state that during the period under review, the listed entity had also received an investigation notice from SEBI with respect trading in its securities on 12<sup>th</sup> October, 2018 to which Company had responded by furnishing desired information/ details in due course. No further notice / query have been received from SEBI in this regard.

Place: Delhi

Dated: 30.05.2019

For MSTR & ASSOCIATES  
COP No. 21678  
Teena Rani  
Partner  
M. No.40050  
CP No.21768