

VIJAY KUMAR MISHRA

B. Com (Hons.), A C A . F C S

PARESH D PANDYA

B. Com., A.C.S.

VKM & ASSOCIATES

PRACTISING COMPANY SECRETARIES

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**Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2022**

To,  
**VINATI ORGANICS LIMITED**  
**B-12 & B-13, MIDC Indl. Area,**  
**Mahad – 402 309,**  
**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 exchange,
- (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, 2022 (“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 - (Not applicable to the Company during the review period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - (Not applicable to the Company during the review period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - (Not applicable to the Company during the review period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013- (Not applicable to the Company during the review period);
- (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 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 thereunder, **except** in respect of matters specified below:

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

<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>
1.	<i>National Stock Exchange of India Limited (NSE) and BSE Limited (BSE) .</i>	<i>Filing of Disclosure of Related party transactions for half year ended 31<sup>st</sup> March, 2021 under Reg 23(9) of LODR, 2015 after 8 days from due date.</i>	<i>Fine of Rs. 40,000/- (plus applicable taxes) each paid to NSE and BSE</i>	<i>Due to 2nd wave of COVID-19 disruption, the company delayed in filing.</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,2021</i>	<i>Actions taken by the Listed Entity; if any</i>	<i>Comments on the Actions taken by the Company</i>
<b>Not Applicable</b>				

(e) During the review period, as per the information provided by the Company, prima facie there were no instances of transaction by the designated persons in the securities of the Company during the closure of trading window.

**For VKM & ASSOCIATES  
Company Secretaries**



  
**(Vijay Kumar Mishra)**  
Partner  
C.P.No.4279

**UDIN : F005023D000320635**  
**PR : 1846/2022**  
**Place : Mumbai**  
**Date : 14/05/2022**