



30th June, 2021

To,
The General Manager,
Department of Corporate Services,
Bombay Stock Exchange Limited,
1st Floor, New Trading Ring,
Rotunda Bldg, P.J. Tower,
Dalal Street, Mumbai – 400001

Ref: BSE Stock Code: 531051

Unit: VINTAGE SECURITIES LIMITED

Sub:- Annual Secretarial Compliance Report for the Year ended 31st March 2021.


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

In compliance with the Regulation 24A of SEBI (LODR) Regulations, 2015 read with the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we enclose herewith the Annual Secretarial Compliance Report of the Company from Miss. Shruti Agarwal, Practising Company Secretary, for the financial year ended 31st March, 2021.

Kindly acknowledge the receipt of the same.

Thanking you,

Yours faithfully,


Vintage Securities Limited

Dinesh Kumar Pandey
(Director)
DIN: 01676842

Vintage Securities Limited
(CIN No. L74120WB1994PLC063991)

Regd & Head Office: 58/3, B.R. B. Basu Road, Kolkata- 700 001 (West Bengal)

Ph. No. 033-2235-2311 Fax No. 033-2249-5656

website: www.vintage-securities.com e-mail: vintage.capital@gmail.com



SHRUTI AGARWAL
PRACTISING COMPANY SECRETARY
MOBILE : + 91 - 9330826989
EMAIL ID : cs.agarwalshruti@gmail.com

Secretarial Compliance Report of Vintage Securities Limited
for the financial year ended 31st March, 2021

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019]

To,
Vintage Securities Limited
58/3, B.R.B. Basu Road, 1st Floor
Kolkata- 700001

I, Shruti Agarwal, Practicing Company Secretary, have examined:

- all the documents and records made available to us and explanation provided by Vintage Securities Limited ("Listed Entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2021 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

Based on the above examination, I hereby report that, during the Review Period:

- The listed entity has complied with the provisions of the above applicable Regulations and circulars/ guidelines issued there under, except in respect of matters specified below:-

Office : Marshall House, 2nd Floor, Room No. 240, 33/1 N.S. Road Pincode: 700001



Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
	<p>Reg. 6(1) – Non-compliance with requirement to appoint a qualified company secretary as the compliance officer.</p> <p>Intimated by Exchange dated Sept 16, 2020.</p>	<p>There was delay in appointment of qualified company secretary as the compliance officer by 8 days.</p> <p>Previous Company Secretary resigned on closing business hour of 03.12.2019.</p> <p>Current Company Secretary was appointed on 11.06.2020.</p> <p>Further the fine imposed by exchange amounting Rs.9440/- including GST (₹ 1,000 per day) Same has been paid on date 24.09.2020 vide NEFT Details- NEFT/000285515846/BSE LTD.</p>	<p>There was delay in appointment of qualified company secretary as the compliance officer by 8 days.</p> <p>Previous Company Secretary resigned on closing business hour of 03.12.2019.</p> <p>Current Company Secretary was appointed on 11.06.2020.</p>
	<p>Regulation 29(2)/29(3) Delay in furnishing prior intimation about the meeting of the board of directors for the meeting held February 13, 2021 for Financial Results quarter ended 31.12.2020.</p> <p>Intimated by Exchange Dated March 15, 2021.</p>	<p>The intimation required under Regulation 29(2)/29(3) to be given at least five days in advance (excluding the date of the intimation and date of the meeting), and such intimation shall include the date of such meeting of board of directors.</p> <p>Hence intimation need to be given on 07.02.2021 however intimation done by company on 08.02.2021 whereas letter was dated 07.02.2021.</p> <p>Further the fine imposed by exchange amounting Rs.11800/- and the Same has been paid on 24.09.2020 vide IMPS/P2A/10911231584/BSE LI/ICI CIEc/XR07580/FIN including GST. (₹ 10,000 per instance of non-compliance per item).</p>	<p>The intimation required under Regulation 29(2)/29(3) to be given at least five days in advance (excluding the date of the intimation and date of the meeting), and such intimation shall include the date of such meeting of board of directors.</p> <p>Hence intimation need to be given on 07.02.2021 however intimation done by company on 08.02.2021 whereas letter was dated 07.02.2021.</p> <p>Further the fine imposed by exchange amounting Rs.11800/- and the Same has been paid on 24.09.2020 vide IMPS/P2A/10911231584/BSE LI/ICIEc/XR07580/FIN including GST. (₹ 10,000 per instance of non-compliance per item).</p>

(b) The Listed Entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of those records on sample basis.



(c) There were no any 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:

(d) The Listed Entity has taken the actions to comply with the observations made in previous reports: Not applicable.

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- Nil.

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- Not Applicable.

Note: My attendance for the purpose of physical verification and examination of the records of the company was impracticable due to lockdown restrictions imposed by the Government due to COVID-19 pandemic and I have, therefore, relied on the electronic data as provided by the company and from the website of Stock Exchanges to gather information and proper records as necessary for verification.

Place: Kolkata
Date: 30.06.2021
UDIN: A038797C000554125



Shruti Agarwal
Practicing Company Secretary
ACS No. : 38797
C P No.: 14602