



Date: 30th May, 2022

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

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2022 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

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, 2022.

Kindly acknowledge the receipt of the same.

Yours faithfully,

For 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



Annual Secretarial Compliance Report of Vintage Securities Limited
for the financial year ended 31st March, 2022

(Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To,
Vintage Securities Limited
58/3, B.R. B. Basu Road,
Kolkata- 700 001

I, Shruti Agarwal, Practising 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, 2022 (“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 (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time; **[Not applicable during the Review Period]**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder; as amended from time to time;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **[Not applicable during the Review Period]**
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 [erstwhile SEBI (Share Based Employee Benefits) Regulations, 2014]; **[Not applicable during the Review Period]**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **[Not applicable during the Review Period]**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **[Not applicable during the Review Period]**



(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.


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, during the period under review.

(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 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 thereunder:

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

Sr. No .	Observation of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2021	Actions taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Listed Entity
1.	<p>Reg. 6(1) – Non-compliance with requirement to appoint a qualified company secretary as the compliance officer. Intimated by Exchange dated Sep 16, 2020. There was delay in appointment of qualified company secretary as the compliance officer by 8 days. Previous Company Secretary Resigned on closing business hour of 03.12.2019. Current Company Secretary was appointed on 11.06.2020. Further the fine imposed by exchange amounting Rs.9440/- including GST. Same has been paid on date 24.09.2020 vide NEFT, details- NEFT/000285515846/BSE LTD.</p>	<p>Reg. 6(1) – Non-compliance with requirement to appoint a qualified company secretary as the compliance officer. Intimated by Exchange dated Sep 16, 2020. There was delay in appointment of qualified company secretary as the compliance officer by 8 days. Previous Company Secretary Resigned on closing business hour of 03.12.2019. Current Company Secretary was appointed on 11.06.2020. Further the fine imposed by exchange amounting Rs.9440/- including GST. Same has been paid on date 24.09.2020 vide NEFT, details- NEFT/000285515846/BSE LTD.</p>	<p>Company has appointed Company Secretary on 11.06.2020. Further the fine imposed by exchange amounting Rs.9440/- including GST. Same has been paid on date 24.09.2020 vide NEFT, details- NEFT/000285515846/BSE LTD.</p>	<p>Company has appointed Company Secretary on 11.06.2020. Further the fine imposed by exchange amounting Rs.9440/- including GST. Same has been paid on date 24.09.2020 vide NEFT, details- NEFT/000285515846/BSE LTD.</p> 

2.	<p>Regulation 29(2)/29(3) Delay in furnishing prior intimation about the meeting of the board of directors for the meeting held on February 13, 2021 for Financial Results quarter ended 31.12.2020. Intimated by Exchange Dated March 15, 2021. 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. Hence intimation need to give on 07.02.2021 however intimation done by company on 08.02.2021 whereas letter was dated 07.02.2021. Further the fine imposed by exchange amounting Rs.11800/- Same has been paid on date 01.04.2021 vide IMPS Reference ID: 811649967. (₹ 10,000 per instance of non-compliance per item).</p>	<p>Regulation 29(2)/29(3) Delay in furnishing prior intimation about the meeting of the board of directors for the meeting held on February 13, 2021 for Financial Results quarter ended 31.12.2020. Intimated by Exchange Dated March 15, 2021. 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. Hence intimation need to give on 07.02.2021 however intimation done by company on 08.02.2021 whereas letter was dated 07.02.2021. Further the fine imposed by exchange amounting Rs.11800/- Same has been paid on date 01.04.2021 vide IMPS Reference ID: 811649967. (₹ 10,000 per instance of non-compliance per item).</p>	<p>Company has noted the same and now regular in furnishing prior intimation of meeting of the board of directors for the meeting held on or after February 13, 2021. Further the fine imposed by exchange amounting Rs.11800/- Same has been paid on date 01.04.2021 vide IMPS Reference ID: 811649967.</p>	<p>Company has noted the same and now regular in furnishing prior intimation of meeting of the board of directors for the meeting held on or after February 13, 2021. Further the fine imposed by exchange amounting Rs.11800/- Same has been paid on date 01.04.2021 vide IMPS Reference ID: 811649967.</p>
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(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- **Mentioned above.**

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.**

Place: Kolkata

Date: 30.05.2022

UDIN: A038797D000431640



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