

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: <u>Annual Secretarial Compliance Report for the year ended 31st March, 2022 as per</u> <u>Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations,</u> 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 Functed

Dinesh Kumar Pande

(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: <u>www.vintage-securities.com</u> e-mail: <u>vintage.capital@gmail.com</u>



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

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

<u>2015)</u>

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

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

(a) all the documents and records made available to us and explanation provided by **Vintage Securities** Limited("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 31st 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, as amended from time to time; [Not applicable during the Review Period]
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and
- Takeovers) Regulations, 2011, as amended from time to time;

(d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,

2015; and circulars/ guidelines issued thereunder; as amended from time to time;

(e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; [Not

applicable during the Review Period]

(f)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]

(g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; [Not applicable during the Review Period]

(h)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 aboveRegulations 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 theStandard Operating Procedures issued by SEBI through various circulars*) under theaforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

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

reports:						
Sr.	Observation of the	Observations made in	Actions taken	Comments of		
No	Practicing Company	the secretarial	by the Listed	the Practicing		
	Secretary in the previous	compliance report for	Entity, if any	Company		
	reports	the year ended		Secretary on		
	-	31.03.2021		the actions		
				taken by the		
				Listed Entity		
1.	Reg. 6(1) –	Reg. 6(1) –	Company has	Company has		
	Non-compliance with	Non-compliance with	appointedComp	appointed		
	requirement to appoint a	requirement to appoint a	any Secretary	Company		
	qualified company secretary	qualified company secretary	on 11.06.2020.	Secretary on		
	as the compliance officer.	as the compliance officer.	Further the fine	11.06.2020.		
	Intimated by Exchange	Intimated by Exchange dated	imposed by	Further the fine		
	dated Sep 16, 2020.	Sep 16, 2020.	exchange	imposed by		
	There was delay in	There was delay in	amounting	exchange		
	appointment of qualified	appointment of qualified	Rs.9440/-	amounting		
	company secretary as the	company secretary as the	including GST.	Rs.9440/-		
	compliance officer by 8 days.	compliance officer by 8 days.	Same has been	,		
				-		
	Previous Company Secretary	Previous Company Secretary	paid on	Same has been		
	Resigned on closing business	Resigned on closing business	date24.09.2020	paid on		
	hour of 03.12.2019.	hour of 03.12.2019.	vide NEFT,	date24.09.2020		
	Current Company Secretary	Current Company Secretary	details-	vide NEFT,		
	was appointed on	was appointed on	NEFT/00028551	details-		
	11.06.2020.	11.06.2020.	5846/BSE LTD.	NEFT/00028551		
	Further the fine imposed by	Further the fine imposed by		5846/BSE LTD.		
	exchange amounting	exchange amounting				
	Rs.9440/- including GST.	Rs.9440/- including GST.				
	Same has been paid on	Same has been paid on				
	date24.09.2020 vide NEFT,	date24.09.2020 vide NEFT,				
	details-	details-				
	NEFT/000285515846/BSE	NEFT/000285515846/BSE		UTI AGAD		
	LTD.	LTD.		Se Pres		
				CP No[14802 -		
				8		
				Ren Cactolin		
				000		

2.	Regulation29(2)/29(3)	Regulation29(2)/29(3)	Company has	Company has
	Delay in furnishingprior	Delay in furnishingprior	noted the same	noted the same
	intimation aboutthe meeting	intimation aboutthe meeting	and now regular	and now
	of theboard of directorsfor	of theboard of directorsfor	in	regular in
	the meeting held	the meeting held onFebruary	furnishingprior	furnishingprior
	onFebruary 13, 2021	13, 2021 forFinancial	intimation of	intimation of
	forFinancial Resultsquarter	Resultsquarter ended	meeting of	meeting of
	ended 31.12.2020.	31.12.2020.	theboard of	theboard of
	Intimated by Exchange	Intimated by Exchange	directorsfor the	directorsfor the
	Dated March 15, 2021.	Dated March 15, 2021.	meeting held	meeting held
	The intimation required	The intimation required	onor after	on or after
	under Regulation29(2)/29(3)	under Regulation29(2)/29(3)	February 13,	February 13,
	to be given at least five days	to be given at least five days	2021.	2021.
	in advance (excluding the	in advance (excluding the	Further the fine	Further the fine
	date of the intimation and	date of the intimation and	imposed by	imposed by
	date of the meeting), and	date of the meeting), and	exchange	exchange
	such intimation shall include	such intimation shall include	amounting	amounting
	the date of suchmeeting of	the date of suchmeeting of	Rs.11800/-	Rs.11800/-
	board of directors.	board of directors.	Same has been	Same has been
	Hence intimation need to	Hence intimation need to	paid on date	paid on date
	give on 07.02.2021 however	give on 07.02.2021 however	01.04.2021 vide	01.04.2021 vide
	intimation done by company	intimation done by company	IMPSReference	IMPSReference
	on 08.02.2021 whereas	on 08.02.2021 whereas	ID: 811649967.	ID: 811649967.
	letter was dated 07.02.2021.	letter was dated 07.02.2021.		
	Further the fine imposed by	Further the fine imposed by		
	exchange amounting	exchange amounting		
	Rs.11800/- Same has been	Rs.11800/- Same has been		
	paid on date 01.04.2021	paid on date 01.04.2021 vide		
	vide IMPSReference ID:	IMPSReference ID:		
	811649967.	811649967.		
	(₹ 10,000 per instance of	(₹ 10,000 per instance of		
	non-compliance per item).	non-compliance per item).		

(Note)

1) Provide the list of all the observations in the report for the previous year alongwith 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 ACSNo. : 38797 C P No.: 14602