

30th June, 2021

To,
The Manager
Department of Corporate Services
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400 001.

Scrip Code: 530627

Dear Sir,

Sub: Annual Secretarial Compliance Report pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Pursuant to Regulation 24A of Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019; please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the Financial Year ended 31st March, 2021 issued by M/s. M Baldeva Associates, Practicing Company Secretaries, Thane.

Kindly take the same on your record.

Thanking you,

Yours faithfully,

For Vipul Organics Ltd.


Kinjal Shah
Company Secretary & Compliance Officer
Membership No.: A58678



SECRETARIAL COMPLIANCE REPORT OF VIPUL ORGANICS LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021

[Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We, M Baldeva Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **Vipul Organics Limited** (“the listed entity”);
- (b) the filings and submissions made by the listed entity to the stock exchange viz., BSE Ltd. (Scrip Code:530627);
- (c) following websites:
 1. The listed entity i.e. www.vipulorganics.com and
 2. The BSE Limited i.e. www.bseindia.com
- (d) other documents or reports filed with the aforesaid Stock Exchange from time to time.

for the financial year ended 31st March, 2021 (“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 during the review period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (not applicable during the review period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (not applicable 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 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 (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;
- (j) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder; and
- (k) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

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, circulars and guidelines issued thereunder, except in respect of matter specified below:

Sr. No.	Compliance Requirement (Regulations / Circulars / guidelines including specific clause)	Deviations	Observation/ Remarks
NIL			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.

- (c) The following is the detail of action 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:

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.
NIL				

(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 financial year ended 31 st March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Company has intimated the Stock Exchange regarding loss of share certificates and issue of the duplicate certificates within 2 days of getting information as specified under Regulation 39 (3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 except in few cases.	In few cases, requests received from five shareholders for issue of duplicate share certificates were not intimated to the Stock Exchange within two days as required under Regulation 39 (3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The Company has intimated the Stock Exchange regarding loss of share certificates and issue of the duplicate certificates within 2 days of getting information as specified under Regulation 39 (3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, except in few cases, which were reported subsequently.	Complied subsequently.
2.	Company to issue certificates within thirty days of the date of lodgement for transfer, sub-division, consolidation renewal, exchange or endorsement of calls/allotment monies as specified under provisions of Regulation 40 of the SEBI (Listing Obligations and	One request for transfer/transmission of shares and issue of duplicate share certificate was not processed within the stipulated time as specified under Regulation 40 of the SEBI (Listing Obligations and Disclosure Requirements)	The company has delivered equity share certificates within 30 days of receipt thereof lodged for transfer, sub-division, consolidation, renewal, exchange as specified under Regulation 40 of the SEBI (Listing Obligations & Disclosure	Complied Subsequently within time line in accordance with the procedure provided under SEBI Circular No. SEBI/HO/MIR SD/DOS3/CIR/P/2018/139 dated

	Disclosure Requirements) Regulations, 2015 except delay in one case.	Regulations, 2015	Requirements) Regulations, 2015, except delay in one case, however, the same was processed subsequently within time line in accordance with the procedure provided under SEBI Circular No. SEBI/HO/MIRSD/DO S3/CIR/P/2018/139 dated 06.11.2018.	06.11.2018.
3.	Registrar and Share Transfer Agent of the Company processed all dematerialization requests within stipulated time as specified under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018 *SEBI vide its letter no. MRD/DOP2/DSA2/OW/2019/2503/1 dated 24 th January, 2019 has granted relaxation in timeline for processing of Dematerialization request number to 30 days till 30 th June 2019 from the current 15 days as specified in Regulation 74(5) of SEBI (Depository & Participants) Regulations, 2018, except in one case.	One dematerialization request was not processed within stipulated time as specified under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018.	Registrar and Share Transfer Agent of the Company processed all dematerialization requests within stipulated time as specified under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018, except in one case due to tremendous volume pressure at RTA's place and same was processed subsequently.	Complied subsequently.

(e) There was no event of appointment/ re-appointment / resignation of statutory auditors of the Company during the review period. Further, terms of appointment of its existing auditors are in compliance with Para 6(A) and 6(B) of Circular No. CIR/CFD/CMD1/114/2019 dated 18th October 2019.

For **M Baldeva Associates**
Company Secretaries

MANISH | Digitally signed
KUMAR | by MANISH
BALDEVA | KUMAR BALDEVA
Date: 2021.06.08
20:15:49 +05'30'

Place : Thane
Date: 8th June, 2021

CS Manish Baldeva
Proprietor
M. No. FCS 6180
C. P. No. 11062
UDIN: F006180C000435268