

**VIKAS WSP LIMITED**

B-86/87, Udyog Vihar, RIICO, Industrial Area

Sriganganagar - 335 002 / INDIA

CIN : L24139HR1988PLC030300

E-mail : vikasvegan@yahoo.com , website : www.vikaswsp Ltd.in

Telephone : 91(154)2494512/2494552 Fax : 91(154)2494361/2475376



**September 07, 2021**

**To**  
**The General Manager,**  
**BSE Limited**  
**Corporate Relation Department,**  
**PhirozeJeejeebhoy Tower**  
**Dalal Street, Mumbai-400001**

**Subject:** Submission of Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2015 for the financial year ended 31.03.2021.

**Scrip Code-519307**

**Dear Sir/Madam,**

Please find attached Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2015 for the financial year ended 31.03.2021 issued by the **M/s. Priyam & Associates**, Practicing Company Secretaries, as Secretarial Auditor of the Company, pursuant to SEBI circular no. CIR/CFD/CMD/1/27/2019 dated February 08, 2019.

This is for your information and records

Thanking You  
Your Faithfully

For **VIKAS WSP LIMITED**

*Gunjan Kumar Karn*  
**Gunjan Kumar Karn** *For Vikas WSP Limited*  
**Company Secretary cum compliance officer**  
**M.No.-A38298**



To  
The Board of Directors  
Vikas WSP Limited  
Railway Road  
Siwani-127046 (India)

Sir

**Annual Secretarial Compliance Report for the Financial Year 2020-2021**

We have been engaged by **Vikas WSP Limited** (hereinafter referred to as 'the Company') bearing CIN: **L24139HR1988PLC030300** whose equity shares are listed on BSE Limited (Security Code: **519307**) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with applicable provisions of SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

**FOR PRIYAM & ASSOCIATES**  
Company Secretaries

**PRIYAM GUPTA**  
(Proprietor)  
C P No. 18567  
Place: MEERUT  
Date: September 04, 2021







**Secretarial compliance report of Vikas WSP Limited  
for the Financial Year ended 31<sup>st</sup> March 2021**

TO  
The Members  
**Vikas WSP Limited**  
Railway Road  
Siwani-127046 (India)

We, Priyam & Associates, Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Vikas WSP Limited ("the 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 31<sup>st</sup> 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 to the Company during the Audit Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit 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 Audit Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;







(i) and circular/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:

Sr. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	As per Regulation 33 the listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter.	Company hold meeting on 04/05/2021 for the approval of financial results for the quarter ended December 2020.	The listed entity did not hold Board Meeting & filed Unaudited Financial Results within 45 days for the quarter ended December 2020.
2.	As per Regulation 33 the listed entity shall submit annual audited financial results for the financial year, within sixty days from the end of the financial year along with the audit report.	Company hold meeting on 12/08/2021 for the approval of financial results for the quarter ended March 2021	The listed entity did not hold Board Meeting & filed Audited Financial Results within 60 days for the quarter ended March 2021.
3.	The Listed Entity need to constitute the Nomination & Remuneration committee as per the provisions mentioned under Regulation 19 of SEBI(LODR) Regulations, 2015	Company failed to constitute committee as per Regulation 19(1)&(2) in quarter ended December 2020	The listed entity failed to constitute committee as per Regulation 19(1)&(2) for the quarter ended December 2020
4.	The listed entity and its material unlisted subsidiaries incorporated in India shall undertake secretarial audit and shall annex with its annual report, a secretarial audit report, given by a company secretary in practice, in such form as may be specified	Company failed to file Annual Secretarial Compliance report within the time prescribed under SEBI (LODR), 2015 for the Financial Year 31 <sup>st</sup> March 2021	The listed entity did not submit Annual Secretarial Compliance Report under Regulation 24A of SEBI (LODR), 2015 within 60 days from the end of Financial Year and further extended by 30 days.







5.	The listed entity shall submit a quarterly compliance report on corporate governance in the format as specified by the Board from time to time to the recognised stock exchange(s) within fifteen days from close of the quarter	Company failed to file Corporate Governance Report within the time prescribed under SEBI (LODR), 2015 and filed on 24/04/2021	The listed entity did not submit Corporate Governance Report under Regulation 27(2) of SEBI (LODR), 2015 for the quarter ended March, 2021.
6.	As per Regulation 44(3) the listed entity shall submit to the stock exchange, within forty-eight hours of conclusion of its General Meeting, details regarding the voting results in the format specified by the Board.	Company filed declaration of postal ballot result on 21/04/2021 but failed to do compliance under 44(3) within 48 hours.	The listed entity did not submit 44(3) within 48 hours of declaration of results of postal ballot.
7.	As per Section 204 of Companies Act, 2013 and other rules made thereunder company needs to spent 2% of Average net profit of last years as Corporate Social Responsibility.	Company has an unspent amount of 202.74 lakh which needs to be spent under CSR	Company failed to spent the unspent amount of CSR in Financial year 2020-21.
8.	All the independent directors are required to register themselves under the Indian Institute of Corporate Affairs.	Independent Directors of the company are not registered under Indian Institute of Corporate Affairs.	Independent Directors of the company failed to get the registrations under Indian Institute of Corporate Affairs.
9.	Company was required to pay advance Tax, GST file Income Tax, Provident Fund, Employees State Insurance, GSTR-1, GSTR-3B Returns in the stipulated time.	Company has not paid any such Tax and nor had filed the returns in prescribed time	The Company is not regular in depositing with appropriate authorities, undisputed statutory dues including Provident Fund, Employees State Insurance, Income Tax, Goods and Service Tax, sales tax, service tax, value added tax, custom duty, Excise Duty, Cess and any other material statutory dues applicable to it, and there have been delays in large number of cases.







- (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 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:

Sr. No	Action taken by	Details of violation	of	Details of action taken E.g. fines, warning letter, debarment etc.	Observations/ remarks of the Practicing Company Secretary, if any
No reportable observations					

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	Observation made in the secretarial compliance report for the year ended... (the year are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

FOR PRIYAM & ASSOCIATES  
Company Secretaries



**PRIYAM GUPTA**  
(Proprietor)

C P No: 18567

Place: Meerut

Date: September 04, 2021

UDIN: A051177C000897209