
VIKAS WSP LIMITED
B-86/87, Udyog Vihar, RIICO, Industrial Area
Snganganagar - 335 002 / INDIA
CIN : L24139HR1988PLC030300
E-mail : vikasvegan@yahoo.com , website : www.vikaswspstd.in
Telephone : 91(154)2494512/2494552 Fax : 91(154)2494361/2475376



July 08, 2023

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

**Ref:-Vikas WSP Limited (Company under CIRP)
Scrip Code: - 519307
ISIN: - INE706A01022**

Subject: Revised Submission of Annual secretarial compliance Report under Regulation 24A of SEBI (Listing obligations and Disclosure Requirements) (Amendment) Regulations, 2015 for the financial year ended 31.03.2023

Dear Sir/Madam,

Please find attached Revised Annual Secretarial compliance Report under Regulation 24A of SEBI (Listing obligations and Disclosure Requirements) (Amendment) Regulations, 2015 for the financial year ended 31.03.2023 issued by the **M/s. PGSS & Associates** , Practicing Company Secretaries (COP 18567 M.No.-51177, as Secretarial Auditor of the company, pursuant to SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019.

You are requested to kindly take note of the same

Thanking You
Yours faithfully

**For Vikas WSP Limited
(Company under Corporate Insolvency Resolution Process)**

Gunjan Kumar Karn,
Company Secretary cum Compliance officer
M.No.-A38298
By order of the Resolution Professional
Mr. Darshan Singh Anand

VIKAS WSP LIMITED
B-86/87, Udyog Vihar, RIICO, Industrial Area
Sriganganagar - 335 002 / INDIA
CIN : L24139HR1988PLC030300
E-mail : vikasvegan@yahoo.com . website : www.vikaswsphtd.in
Telephone : 91(154)2494512/2494552 Fax : 91(154)2494361/2475376



Resolution Professional
IBBI Reg. No.: IBBI/IPA-002/IP-N00326/2017-18/10931

(Vikas WSP Limited is under corporate insolvency resolution process pursuant to the provisions of the Insolvency and Bankruptcy Code, 2016. With effect from February 02, 2022, its affairs, business and assets are being managed by, and the powers of the board of directors are vested in, the Interim Resolution Professional, Mr. Darshan Singh Anand (IP Registration No. IBBI/IPA-002/IP-N00326/2017-2018/10931, appointed by the National Company Law Tribunal, Chandigarh Bench by order dated 02nd February, 2022 under the provisions of the code, which was published on the website of the Hon'ble National Company Law Tribunal, Chandigarh Bench on 02nd February, 2022 and continued as Resolution Professional by the 02nd committee of creditors(CoC) in its meeting held on 17th March, 2022 under the provisions of the Code.)

**PGSS & ASSOCIATES
COMPANY SECRETARIES**

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgssheadoffice@gmail.com
Contact: 9910157983, 9560049116

24A-Annual Secretarial Compliance Report (ASCR) of VIKAS WSP LIMITED

for the year ended 31st March 2023

(Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 & Notice No. - 20230410-41 dated 10.04.2023)

To,
The Resolution Professional
The Board of Directors (Suspended under CIRP)
Members
Vikas WSP Limited
Railway Road
Siwani-127046
Haryana (India)

M/s VIKAS WSP LIMITED was undergoing Corporate Insolvency Resolution Process ("CIRP") vide Hon'ble National company Law Tribunal, Chandigarh Bench, vide order dated 02.02.2022 ("order")

The Hon'ble NCLT vides its order dated February 02, 2022, allowed initiation of CIRP of the Company and **Mr. Darshan Singh Anand**, IP Registration No. IBBI/IPA-002/IP-N00326/2017-18/10931 was appointed the Company's Interim Resolution Professional ("IRP"). The appointment of **Mr. Darshan Singh Anand** was confirmed /approved as the Resolution Professional ("RP") of the Company by the 02nd Committee of Creditors ("CoC") in its meeting held on 17th March 2022 under the provisions of the Code. As per Section 17 of the Code, from the date of appointment of the IRP, the management of affairs and powers of the Company's board of directors were suspended and exercised by IRP/RP of the Company.

The Company had received 5 Resolution Plans which were put to vote before the Committee of Creditors ("CoC"). The Committee of Creditors (CoC) has approved the resolution plan submitted by **M/s Arcbolt Space and Foods Private Limited**, with a requisite majority of the voting share as per the Insolvency and Bankruptcy Code, 2016 (IBC) in the 11th Meeting of the Committee of Creditors (COC) held on **Thursday 25th August 2022**. The application for approval of the Resolution Plan by NCLT under Section 30(6) of the Insolvency and Bankruptcy Code, 2016 was filed on 31.10.2022 and the same is pending adjudication before Adjudicating Authority.

*We, **PGSS & Associates** have examined:

- 1) all the documents and records made available to us and explanation provided by VIKAS WSP LIMITED CIN L24139HR1988PLC030300 BSE Scrip Code: 519307 VIKASWSP ("the listed entity"),
- 2) the filings/submissions made by the listed entity to the stock exchanges



PGSS & ASSOCIATES
COMPANY SECRETARIES

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgsheadoffice@gmail.com
Contact: 9910157983, 9560049116

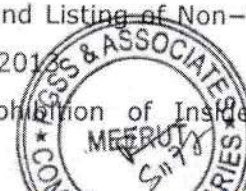
- 3) website of the listed entity,
- 4) any other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on 31st March, 2023 ("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 there under 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 for the financial year ended 31st March, 2023 ("Review Period"), have been examined, include:

- (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 there under and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");
- (c) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (d) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (e) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (f) Securities and Exchange Board of India (Buy back of Securities) Regulations, 2018;
- (g) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (h) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (i) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



PGSS & ASSOCIATES COMPANY SECRETARIES

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgssheadoffice@gmail.com
Contact: 9910157983, 9560049116

- (k) Securities and Exchange Board of India (Depository Participants) Regulations, 1996 & 2018;
- (l) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (m) Any other regulations, circulars etc issued by SEBI applicable to the Company. and circulars/ guidelines issued thereunder;

The Company has confirmed that regulations mentioned above under clause (d), (f), (g), (h) & (i) are not applicable to it. and based on the above examination, I/We hereby report that, during the Review Period:

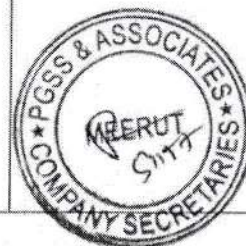
Sr. No.	Particulars Compliance status	(Yes/No/NA)	Observations/Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI) as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable</p> <p>Secretarial Standard-1 Secretarial Standard -2</p>	Yes	<p>The Company is presently undergoing Corporate Insolvency Resolution Process ("CIRP") during review period.</p> <p>Pursuant to sub-regulation (2A) and 2(B) in Regulation 15 in LODR, the entire provisions of Regulation 17, 18, 19, 20 and 21, including with regard to holding requisite number of meetings in a year and composition of the Board of Directors, Audit Committee, Nomination and Remuneration Committee, stakeholders Relationship Committee and Risk Management Committee, are not applicable.</p>



**PGSS & ASSOCIATES
COMPANY SECRETARIES**


Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgssheadoffice@gmail.com
Contact: 9910157983, 9560049116

<p>2.</p>	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the Regulations /circulars /guidelines issued by SEBI 	<p>Yes</p>	<p><i>The Company was undergoing Corporate Insolvency Resolution Process ("CIRP") during review period.</i></p>
<p>3.</p>	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> The Listed entity is maintaining a functional website Timely dissemination of the documents/information under a separate section on the website Web-links provided in annual corporate governance reports under Regulation 27(2)are accurate and specific which re-directs to the relevant document(s)/section of the website 	<p>Yes</p>	
<p>4.</p>	<p>Disqualification of Director:</p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	<p>NA</p>	<p><i>The Company is undergoing Corporate Insolvency Resolution Process ("CIRP") during review period. The powers of the Board of Directors are suspended and are being exercised by Interim Resolution Professional (IRP).</i></p>
<p>5.</p>	<p>To examine details related to Subsidiaries of listed entities:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	<p>NA</p>	<p>Not Applicable</p>



**PGSS & ASSOCIATES
COMPANY SECRETARIES**

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgsheadoffice@gmail.com
Contact: 9910157983, 9560049116

<p>6.</p>	<p>Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	<p>Yes</p>	
<p>7.</p>	<p>Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.</p>	<p>NA</p>	<p>The Company was undergoing Corporate Insolvency Resolution Process ("CIRP") during review period.</p>
<p>8.</p>	<p>Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved /ratified /rejected by the Audit committee</p>	<p>NA</p>	<p>The Company was undergoing Corporate Insolvency Resolution Process ("CIRP") during review period.</p>
<p>9.</p>	<p>Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	<p>Yes</p>	
<p>10.</p>	<p>Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	<p>Yes</p>	

PGSS & ASSOCIATES
COMPANY SECRETARIES

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgsheadoffice@gmail.com
Contact: 9910157983, 9560049116

<p>11. Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder</p>	<p>No</p>	<p>As per the information provided by the Management, no action taken by SEBI or Stock Exchange against the listed entity / its promoters / Directors / subsidiaries (if any)</p>
<p>12. Additional Non-compliances, if any:</p> <p>No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.</p>	<p>Yes</p>	<p>Mentioned in Statement of Facts and Note Below.</p>

a) The listed entity has complied with the provisions of the above Regulations and circulars/Guidelines issued there under as applicable to it except in respect of matters specified below:

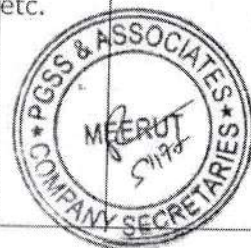
S. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation / Circulars	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Submission of the Financial Results under Regulation 33 of SEBI (LODR) Regulations 2015.	Regulation 33 of SEBI (LODR) Regulation 2015.	Non-filing			Non-filing of financial results for the quarter ended 30.06.2022, 30.09.2022, 31.12.2022 and 31.03.2023	As per the information provided by the Management, no fine imposed by SEBI or stock Exchange to its Director	Non-filing of financial results for the quarter ended 30.06.2022, 30.09.2022, 31.12.2022 and 31.03.2023. As informed and confirmed from management of Listed Entity has not	Company is under Insolvency Bankruptcy code and whenever RP and management receive Penalty from BSE then RP will pay the penalty and	



**PGSS & ASSOCIATES
COMPANY SECRETARIES**

**Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgssheadoffice@gmail.com
Contact: 9910157983, 9560049116**

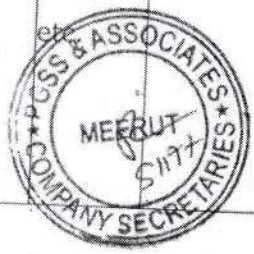
						officer etc.	payment of all 4 Quarter requisite fine in Results is terms of under Circular No. Process and SEBI/HO/CFD/C declare MD/CIR/P/2020 shortly /12 dated 22.01.2020
2	SEBI(Listing Obligations and Disclosure Requirements)	Regulation 34 of SEBI (LODR) Regulations 2015.	Non-filing			Non-filing of Annual Report for the financial year 2022-23	As per the information provided by the Management, no fine imposed by SEBI or stock Exchange to its Directors, promoters, Compliance officer etc.
						Non-filing of Annual Report for the financial year 2022-23. The Company did not conduct AGM for FY 2022-2023.	Company is under Insolvency Bankruptcy code and RP with help of Corporate Debtor arrange the AGM for the FY 2021-2022 and AGM will be 28.07.2023 and after that RP will conduct the AGM for the Financial year 2022-2023 and then CS will send Annual Report to the BSE and all



**PGSS & ASSOCIATES
COMPANY SECRETARIES**

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgssheadoffice@gmail.com
Contact: 9910157983, 9560049116

							concerned person and departments
3.	SEBI(Listing Obligations and Disclosure Requirements)	Regulation 24A of SEBI (LODR) Regulation s 2015.	Late filing	Late filing of Annual Secretarial Compliance report under Regulation 24A for the financial year 2021-22.	As per the information provided by the Management, no fine imposed by SEBI or stock Exchange to its Director s, promote Actual date of filing: 08/07/2022	Late filing of Annual Secretarial Compliance report under Regulation 24A for the financial year 2021-22. Last date of filing: 30/05/2022 Actual date of filing: 08/07/2022	Company is under Insolvency Bankruptcy code and all compliance held with permission of COC. So that when COC approved the Appointment of Secretarial Auditor and approve the Fees, then Secretarial Audit Start. So that CS sent 24 A to BSE minor delay.



**PGSS & ASSOCIATES
COMPANY SECRETARIES**

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgsheadoffice@gmail.com
Contact: 9910157983, 9560049116

b) The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	1
Compliance Requirement (Regulations/ Circulars/guidelines including specific clause)	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.
Regulation / Circular No	Regulation 33
Deviations	Company Holds meeting on 01/10/2021 for approval of Financial results for the Quarter ended June 2021
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	Company Didn't hold Board meeting and field unaudited Financial results within 45 days for the quarter ended June 2021
Fine Amount	2,65,500
Observations/Remarks of the Practicing Company Secretary	Company Didn't hold Board meeting and field unaudited Financial results within 45 days for the quarter ended June 2021
Management Response	After death of Promoter cum Managing Director Late B.D. Aggarwal Mrs. Kamini Jindal & Mrs. Bimla Devi Jindal take some more times for understand the Financial Parts of CD
Remarks	None

S. No.	2
Compliance Requirement (Regulations/ Circulars / guidelines including specific clause)	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.
Regulation / Circular No	Regulation 33
Deviations	Company Holds meeting on 20/05/2022 for approval of Financials



**PGSS & ASSOCIATES
COMPANY SECRETARIES**

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgssheadoffice@gmail.com
Contact: 9910157983, 9560049116

	results for the Quarter ended September 2021
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	Company Didn't hold Board meeting and field unaudited financial results within 45 days for the quarter ended September 2021
Fine Amount	Fine not received from BSE (Aprox fine will be-10,97,400)
Observations/Remarks of the Practicing Company Secretary	Company Didn't hold Board meeting and field unaudited financial results within 45 days for the quarter ended September 2021
Management Response	The Company admitted in NCLT for corporate insolvency as on 02.02.2022. Management did not Provide all Information and documents to RP. So that RP filed application with NCLT for Non-Cooperation of Past Management on account of which financials could not be finalized. So that Financial results not declare on prescribed time.
Remarks	None

S. No.	3
Compliance Requirement (Regulations/ Circulars / guidelines including specific clause)	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.
Regulation / Circular No	Regulation 33
Deviations	Company Holds meeting on 11/06/2022 for approval of Financials results for the Quarter ended December 2021
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	Company Didn't hold Board meeting and field unaudited financial results within 45 days for the quarter ended December 2021
Fine Amount	Fine not received from BSE (Aprox fine will be-6,84,400)
Observations/Remarks of the Practicing Company Secretary	Company Didn't hold Board meeting and field unaudited financial results within 45 days for the quarter ended December 2021
Management Response	The Company admitted in NCLT for corporate insolvency as on

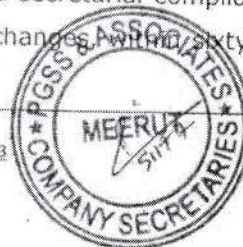


**PGSS & ASSOCIATES
COMPANY SECRETARIES**

**Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgsheadoffice@gmail.com
Contact: 9910157983, 9560049116**

	02.02.2022. Management did not Provide all Information and documents to RP. So that RP filed application with NCLT for Non Cooperation of Past Management on account of which financials could not be finalized. So that Financial results not declare on prescribed time.
Remarks	None
S. No.	4
Compliance Requirement (Regulations/ Circulars / guidelines including specific clause)	The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within 45 days of end of each quarter, other than the last quarter.
Regulation / Circular No	Regulation 33
Deviations	Company Holds meeting on 30/12/2022 for approval of Financials results for the Quarter and year ended March 2022
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	Company Didn't hold Board meeting and field unaudited financial results within 60 days for the year ended March, 2022
Fine Amount	Fine not received from BSE(Aprox fine will be-12,56,700)
Observations/Remarks of the Practicing Company Secretary	Company Didn't hold Board meeting and field unaudited financial results within 45 days for the quarter ended March 2022
Management Response	The Company admitted in NCLT for corporate insolvency as on 02.02.2022. Management did not Provide all Information and documents to RP. So that RP filed application with NCLT for Non-Cooperation of Past Management on account of which financials could not be finalized. So that Financial results not declare on prescribed time.
Remarks	None

S. No.	5
Compliance Requirement (Regulations / Circulars / guidelines including	The listed entity shall submit a secretarial compliance report in such form as specified, to stock exchanges within sixty days from end of each financial year.

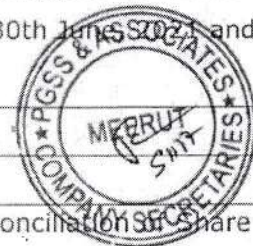


PGSS & ASSOCIATES
COMPANY SECRETARIES

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgsheadoffice@gmail.com
Contact: 9910157983, 9560049116

specific clause)	
Regulation / Circular No	Regulation 24A
Deviations	Company failed to submit Annual Secretarial Compliance report within the prescribed time under SEBI (LODR), 2015 for the Financial Year 31st March 2021
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	The listed entity did not submit Annual Secretarial Compliance Report under Regulation 24A of SEBI (LODR) REGULATIONS, 2015 within 60 days from the end of Financial Year and further extended by 30 days actually it was filed on 07 September 2021
Fine Amount	1,28,000
Observations/Remarks of the Practicing Company Secretary	The listed entity did not submit Annual Secretarial Compliance Report under Regulation 24A of SEBI (LODR) REGULATIONS, 2015 within 60 days from the end of Financial Year and further extended by 30 days actually it was filed on 07 September 2021
Management Response	Company is under Insolvency Bankruptcy code and all compliance held with permission of COC. So that when COC approved the Appointment of Secretarial Auditor and approve the Fees, then Secretarial Audit Start. So that CS sent 24 A to BSE minor delay.
Remarks	None

S. No.	6
Compliance Requirement (Regulations/ Circulars / guidelines including specific clause)	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018
Regulation / Circular No	Regulation 76
Deviations	Company failed to filed the Reconciliation of Share Capital Audit within 30 days from quarter ended 30th June 2021 and actually filed on 02/08/2021
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	The listed entity did not submit Reconciliation of Share Capital Audit under Regulation 76 of SEBI (Depositories and Participants)



PGSS & ASSOCIATES
COMPANY SECRETARIES

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgssheadoffice@gmail.com
Contact: 9910157983, 9560049116

	Regulations, 2018 for the quarter ended June, 2021 within the prescribed time.
Fine Amount	Not received any Penalty from BSE
Observations/Remarks of the Practicing Company Secretary	The listed entity did not submit Reconciliation of Share Capital Audit under Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018 for the quarter ended June, 2021 within the prescribed time.
Management Response	The CS was on leave. So that RTA Audit Report sent to BSE delay
Remarks	None

S. No.	7
Compliance Requirement (Regulations/ Circulars / guidelines including specific clause)	The listed entity shall submit a stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities in the format specified by the Board of from time to time on quarterly basis, within 21 days from the end of each quarter.
Regulation / Circular No	Regulation 31(1)(b)
Deviations	Company failed to filed Shareholding pattern within the specified time i.e. 21 days from the end of quarter ended June, 2021
Action Taken by	SEBI
Type of Action	Monetary penalty
Details of Violation	The listed entity didn't upload Shareholding pattern under Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015 within the 21 days from end of quarter ended June, 2021 and actually filed on 31st July, 2021.
Fine Amount	21,240
Observations/Remarks of the Practicing Company Secretary	The listed entity didn't upload Shareholding pattern under Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015 within the 21 days from end of quarter ended June, 2021 and actually filed on 31st July, 2021.
Management Response	The CS was on leave. So that Shareholding pattern sent to BSE delay
Remarks	None

S. No.	8
Compliance Requirement	The Listed entity in pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 submit and close Trading window for all the



**PGSS & ASSOCIATES
COMPANY SECRETARIES**

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgssheadoffice@gmail.com
Contact: 9910157983, 9560049116

(Regulations/ Circulars / guidelines including specific clause)	designated persons and their immediate relative from the end day of quarter ended till the 48 hours after declaration of Financial Results of the Company.
Regulation / Circular No	LIST/COMP/01/2019-20 dated 02 nd April, 2019
Deviations	The Listed entity failed to close and submit Trading window disclosure for the designated persons and their immediate relatives for the quarter ended June, 2021
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	The Listed entity failed to close and submit Trading window disclosure for the designated persons and their immediate relatives for the quarter ended June, 2021
Fine Amount	No any Penalty
Observations/Remarks of the Practicing Company Secretary	The Listed entity failed to close and submit Trading window disclosure for the designated persons and their immediate relatives for the quarter ended June, 2021
Management Response	Trading window already closure since last many days.
Remarks	None

S. No.	9
Compliance Requirement (Regulations/ Circulars / guidelines including specific clause)	Statement of Investor complaints disclosure sent to BSE
Regulation / Circular No	Regulation 13(3)
Deviations	Company failed to filed compliance within the prescribed time under regulation 13(3) for the quarter ended June, 2021 and filed on 31/07/2021.
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	The listed entity did not submit Statement of Investor Complaints under regulation 13(3) of SEBI (LODR), 2015 for the quarter ended June, 2021.
Fine Amount	10620
Observations/Remarks	The listed entity did not submit Statement of Investor Complaints



**PGSS & ASSOCIATES
COMPANY SECRETARIES**

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgsheadoffice@gmail.com
Contact: 9910157983, 9560049116

of the Practicing Company Secretary	under regulation 13(3) of SEBI (LODR), 2015 for the quarter ended June, 2021.
Management Response	The CS was on leave. So that Investor Compliant Disclosure sent to BSE delay
Remarks	None

S. No.	10
Compliance Requirement (Regulations / Circulars / guidelines including specific clause)	The listed entity shall submit a quarterly report on corporate governance in the format as specified by the board from time to time to the recognised stock exchange within 21 days from the end of each quarter.
Regulation / Circular No	Regulation 27(2)
Deviations	Company failed to filed compliance within the prescribed time under regulation 27(2) for the quarter ended June, 2021 and filed on 02/08/2021
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	The listed entity did not submit Corporate Governance Report under regulation 27(2) of SEBI (LODR), 2015 for the quarter ended June, 2021 within the prescribed time.
Fine Amount	25,960
Observations/Remarks of the Practicing Company Secretary	The listed entity did not submit Corporate Governance Report under regulation 27(2) of SEBI (LODR), 2015 for the quarter ended June, 2021 within the prescribed time.
Management Response	The CS was on leave. So that Corporate Governance Report sent to BSE delay
Remarks	None

Statement of Facts

Company failed to provide the complete information in terms of signed minutes, Statutory registers, RoC Filing for the purpose of Secretarial Audit in accordance with the provisions of Section 204 of Companies Act, 2013 and Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. As per the information given by the company and FIR dated 18/12/2021 that records of the company were stolen which includes signed minutes, Statutory registers and other records, company was trying to retrieve data but data cannot be fully recovered.



**PGSS & ASSOCIATES
COMPANY SECRETARIES**

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgsheadoffice@gmail.com
Contact: 9910157983, 9560049116

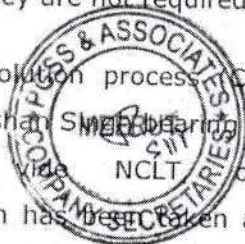
Our Report is on the basis of the limited information provided by the company and available data on BSE website and rest we rely on the information provided by the company in the Management Representation letter dated 07.07.2023.

Note:

As the powers of the Board of Directors have been suspended, the aforesaid documents are signed and approved by the Resolutions Professional only.

1. As per Regulation 33(2)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the financial results of a company submitted to the Stock Exchange shall be signed by the Chairperson or Managing Director or Whole Time Director or in absence of all of the them, it shall be signed by any Director of the company who is duly authorised by the board of Directors to sign the financial results. Pursuant to the order of Hon'ble NCLT initiating Corporate Insolvency Resolution process (CIRP) the power of the board of Directors stand suspended and such powers are excisable by RP.
2. TDS return of Q2 and Q4 filed late and for Q3 no acknowledgement of Return has been provided, Payment of TDS for April 2022 was done late by the company for the period under the period of review.
3. Independent directors Mr. Anandilal, Vishandutt were appointed on 05/10/2021, and Suman Devi was appointed on 21/12/2021 as additional directors still they are reflecting as addition on MCA portal and has not been regularized yet and also the IICA independent Directors Data bank registration was also expired during the middle of year under the period of review.
4. Form GNL-2 was filed 3 times during the period of review for appointment of Internal Auditor, Appointment of Secretarial Auditor, and extension of AGM by 3 months.
5. As informed by the management Some ROC Filing Pending, because MCA not working proper.
6. CSR Unspent amount for the preceding years has not been spent yet.
7. The Company has been given trading terminal By NSE wide circular dated 16/082019.
8. Details if CIRP proceedings, RP, are mentioned on the website of the company and COC proceedings and meetings are not mentioned on website as they are not required to do so.

(A) The Hon'ble NCLT has initiated the Corporate Insolvency Resolution process (CIRP) under Insolvency and Bankruptcy, code 2016 and has appointed IRP Mr. Darshan Singh for registration No.,IBBI/PA-002/IP-N00326/2017-18/10931 under the CIRP order No. NCLT/CHD/REG/901 dated 02/02/2022. As intimated, no other action has been taken against the



PGSS & ASSOCIATES COMPANY SECRETARIES

Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgssheadoffice@gmail.com
Contact: 9910157983, 9560049116

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.

Further, there are several ongoing cases against the suspended management in the Hon'ble NCLT.

Assumptions & Limitation of scope and Review:

Wherever required, we have obtained the Management Representation about the compliance of laws, rules and regulations and happening of events etc. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on test basis. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. Our Certificate is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company

Place: Meerut, UP

Date: 07.07.2023

FOR PGSS & ASSOCIATES
COMPANY SECRETARIES


PRIYAM GUPTA
PARTNER

FCS No.: 51177/CP No. 18567
ICSI UDIN: A051177E000568861
PR: 3531/2023



**PGSS & ASSOCIATES
COMPANY SECRETARIES**

**Add. 35/3A/3, Old Delhi Chungi
Delhi Road Meerut UP 250002
email: pgssheadoffice@gmail.com
Contact: 9910157983, 9560049116**

Annexure A

To,
The Resolution Professional
The Board of Directors (Suspended under CIRP)
Members
Vikas WSP Limited
Railway Road Siwani-127046
Haryana (India)

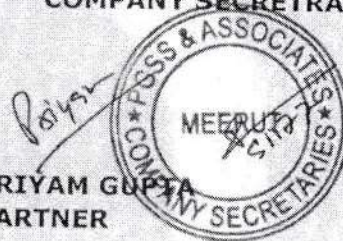
Our report of even date is to be read along with this letter.

1. Maintenance of secretarial record is the responsibility of the management of the Listed Entity. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. Some part of Audit was conducted offline. We have also conducted online verification and examination of the relevant documents and records as facilitated by the listed entity for the purpose of issuing this Annual Secretarial Compliance Report. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the listed entity.
4. Wherever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of SEBI laws, rules, regulation and other applicable laws, rules regulations, standards is the responsibility of management. Our examination was limited to the verification of compliance done by the listed entity.
6. The Annual Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Meerut, UP

Date: 07.07.2023

**FOR PGSS & ASSOCIATES
COMPANY SECRETARIES**



**PRIYAM GUPTA
PARTNER**

FCS No.:51177/CP No.:18567

ICSI UDIN: A051177E000568861

PR: 3531/2023