

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



May 31, 2024

**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: Submission of Annual secretarial compliance Report under Regulation 24A of SEBI (Listing obligations and Disclosure Requirements) (Amendment) Regulations, 2015 for the financial year ended 31.03.2024.

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 31.03.2024 issued by the **M/s. Seema Sharma & Associates**, Practicing Company Secretaries (COP-11118 M. No.- 8413(FCS)), 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

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GUNJAN KUMAR KARN
Date: 2024.05.31
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Gunjan Kumar Karn,
Company Secretary cum Compliance officer
M.No.-A38298
By order of the Resolution Professional

VIKAS WSP LIMITED

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Mr. Darshan Singh Anand

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.)

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by GUNJAN
KUMAR KARN
Date: 2024.05.31
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24A-Annual Secretarial Compliance Report (ASCR) of VIKAS WSP LIMITED
for the year ended 31st March 2024

(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 Resolution Professional (RP) has filed an application with Hon'ble NCLT, Chandigarh Bench for Approval of the Resolution Plan of **M/s Arcbolt Space and Foods Private Limited**, approved by the Committee of Creditors in the 11th COC Meeting. Hon'ble NCLT in its hearing held on 01.05.2024 has reserved the order.*



*We, **Seema Sharma & 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,
- 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, 2024 ("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 and guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act,1956("SCRA"),Rules made there under and the Regulations, circulars and 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, 2024 ("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 thereunder 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;
- (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 clauses (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*
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<p>1. 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</p> <p>Secretarial Standard –2</p>	<p>Yes</p>	<p><i>The Company is presently undergoing Corporate Insolvency Resolution Process ("CIRP") during review period.</i></p> <p>Pursuant to sub-regulation (2A) and (2B) 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>
<p>2. 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 a Corporate Insolvency Resolution Process ("CIRP") during the review period.</i></p>



3. Maintenance and disclosures on Website: <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	Yes	<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). But the Listed entity is maintaining a functional website.</i>
4. Disqualification of Director: <p>All the Directors are disqualified, DIN is deactivated.</p>	NA	<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). None of the Director filled DIR-3-KYC web form.</i>
5. To examine details related to Subsidiaries of listed entities: <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	NA	Not Applicable The Company does not have any material subsidiary companies.



6. 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.	Yes	<i>The Company was undergoing a Corporate Insolvency Resolution Process ("CIRP") during te review period but all the documents which have been filed are preserved.</i>
7. Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of financial year as prescribed in SEBI Regulations.	NA	<i>The Company was undergoing a Corporate Insolvency Resolution Process ("CIRP") during review period. The Board is suspended and powers shifted to RP.</i>
8. 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.	NA	<i>The Company is undergoing a Corporate Insolvency Resolution Process ("CIRP") during the review period and with no business operations, it was noted that, no related party transaction has been entered with any group company during the period under review. However, the expenses incurred and/ or transactions underwent during the period from 01.04.2023 to 31.03.2024 by the company were duly disclosed and the required</i>



			<i>Related Party Disclosure was filed.</i>
9.	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.	Yes	<i>The Company was undergoing Corporate Insolvency Resolution Process ("CIRP") during review period.</i>
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	Actions taken by SEBI or Stock Exchange(s), if any: 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.	No	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)
12.	Additional Non-compliances, if any: No additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	Mentioned in Statement of Facts and Note Below.

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



S. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No	Deviations	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) Regulations 2015.	Non-filing	Stock-Exchange	Advisory	Filing of financial results for the quarter ended 31.03.2023, 30.06.2023, 30.09.2023, 31.12.2023 with delay as on 09.05.2024, Non-filing of financial results for the quarter and year ended 31.03.2024	As per the information provided by the Management, no fine imposed by SEBI or stock Exchange to its Directors, promoters, Compliance officer etc.	Filing of financial results for the quarter ended 30.06.2023, 30.09.2023, 31.12.2023 and non-filing of quarter and year ended 31.03.2024. As informed and confirmed from management of Listed Entity has not made payment of requisite fine in terms of Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated 22.01.2020	Company declares results for quarter ended 31.03.2023 and 30.06.2023, 30.09.2023 and 31.12.2023 as on 09.05.2024 and the results of are under process as the Company is under CIRP.	



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 2022-2023	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 was held on 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 concerned person and
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3.	SEBI (Listing Obligations and Disclosure Requirements)	Regulation 24A of SEBI (LODR) Regulations 2015.	Late filing			Late filing of Annual Secretarial Compliance report under Regulation 24A for the financial year 2022-23. Last date of filing: 30/05/2022 Actual date of filing: 08/07/2023	As per the information provided by the Management, no fine imposed by SEBI or stock Exchange to its Director, promote compliance officer etc.	Late filing of Annual Secretarial Compliance report under Regulation 24A for the financial year 2022-23. Last date of filing: 30/05/2022 Actual date of filing: 08/07/2023	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. CS has



									sent 24 A to BSE with minor delay.	
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The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	1.1
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	The Company held a Board meeting on 19.09.2023 for approval of Unaudited Standalone Financial Results for the First Quarter (Q-1) ended as on 30 th June, 2022.
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	Company didn't held Board Meeting and filed unaudited financial results within 45 days for the First Quarter (Q-1) ended as on 30 th September, 2022.
Fine Amount	Fine not received from BSE
Observations/Remarks of the Practicing Company Secretary	The Company didn't held a Board meeting and filed unaudited financial results within 45 days for the First Quarter (Q-1) ended as on 30 th June, 2022.
Management Response	The Company admitted in NCLT for corporate insolvency as on 02.02.2022. The Ex-Management did not provide all Information and documents to RP. The RP has filed application with NCLT for Non-Cooperation of Past Management on account of which financials could not be finalized. The Financial results could not be declared on the prescribed time.
Remarks	None



S. No.	1.2
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	The Company Holds a meeting on 30.10.2023 for approval of Unaudited Standalone Financial Results for the Second Quarter(Q-2) and six months ended 30 th September, 2022 & Unaudited Standalone Financial Results for the Third Quarter(Q-3) and nine months ended on 31 st December, 2022.
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	The Company Didn't held a Board meeting and field unaudited financial results within 45 days for the Second Quarter (Q-2) and six months ended 30 th September, 2022 and Third Quarter (Q-3) and nine months ended on 31 st December, 2022.
Fine Amount	Fine not received from BSE
Observations/Remarks of the Practicing Company Secretary	The Company didn't held Board Meeting and filed unaudited financial results within 45 days for the approval of Unaudited Standalone Financial Results for the Second Quarter (Q-2) and six months ended 30 th September, 2022 & Unaudited Standalone Financial Results for the Third Quarter (Q-3) and nine months ended on 31 st December, 2022.
Management Response	The Company admitted in NCLT for corporate insolvency as on 02.02.2022. The Ex-Management did not provide all Information and documents to RP. The RP has filed application with NCLT for Non-Cooperation of Past Management on account of which financials could not be finalized. So that Financial results could not be declared on the prescribed time.
Remarks	None



S. No.	1.3
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 the end of each quarter, other than the last quarter.
Regulation / Circular No	Regulation 33
Deviations	The Company held a meeting on 09.05.2024 for approval of Audited Standalone Financial Results for the Fourth Quarter (Q-4) and year to date ended 31 st March, 2023
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	The Company Didn't hold Board Meeting and field unaudited financial results within 60 days for the year ended 31.03.2023
Fine Amount	Fine not received from BSE
Observations/Remarks of the Practicing Company Secretary	The Company didn't held Board Meeting and file Audited Standalone Financial Results for the Fourth Quarter (Q-4) and year to date ended 31 st March, 2023 within 60 days for the year ended 31.03.2023
Management Response	The Company admitted in NCLT for corporate insolvency as on 02.02.2022. The Ex-Management did not provide all Information and documents to RP. The RP has filed application with NCLT for Non-Cooperation of Past Management on account of which financials could not be finalized. So that Financial results could not be declared on the prescribed time.
Remarks	None

S. No.	2
Compliance Requirement (Regulations/ Circulars	The listed entity shall submit to the stock exchange and publish on its website a) a copy of the annual report sent to the shareholders along



/ guidelines including specific clause)	with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders; b) in the event of any changes to the annual report, the revised copy along with the details of and explanation for the changes shall be sent not later than 48 hours after the annual general meeting
Regulation / Circular No	Regulation 34
Deviations	Non Filling of Annual Report for the Financial year 2022-2023
Action Taken by	BSE
Type of Action	Monetary penalty
Details of Violation	The Company didn't hold AGM for the Financial year 2022-2023
Fine Amount	Fine not received from BSE
Observations/Remarks of the Practicing Company Secretary	The listed entity did not submit the report as no AGM was conducted for F.Y. 2022-2023.
Management Response	The Company was admitted in NCLT for corporate insolvency as of 02.02.2022. Management did not provide all information and documents to RP. So RP filed an application with NCLT for Non-Cooperation of Past Management on account of which financials could not be finalized timely. The Company conducted the AGM for F.Y.-2021-2022 on 28.07.2023 and AGM for F.Y.-2022-2023 is under process.
Remarks	None

S. No.	3
Compliance Requirement (Regulations/ Circulars / guidelines including specific clause)	The listed entity shall submit a secretarial compliance report in such form as specified, to stock exchanges, within sixty days from the end of each financial year.
Regulation / Circular No	Regulation 24A



Deviations	The Company failed to submit Annual Secretarial Compliance report within the prescribed time under SEBI (LODR), 2015 for the Financial Year 31st March 2022.
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 it was filed on 8 th July 2022.
Fine Amount	Fine not received from BSE
Observations/Remarks of the Practicing Company Secretary	The listed entity did not submit the Annual Secretarial Compliance Report under Regulation 24A of SEBI (LODR) Regulations, 2015 within 60 days from the end of the Financial Year and further extended by 30 days actually it was filed on 8 th July, 2022.
Management Response	The company is under the Insolvency Bankruptcy code and all compliance is held with permission of COC. So that when the COC approves the Appointment of a Secretarial Auditor and approves the Fees, the Secretarial Audit starts. The CS sent 24 A to BSE with a minor delay.
Remarks	None

Statement of Facts

The company failed to provide the complete information in terms of signed minutes, Statutory registers, and RoC Filing for the purpose of Secretarial Audit in accordance with the provisions of Section 204 of the 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 records of the company were stolen including signed minutes, Statutory registers and other records, the company was trying to retrieve data but data cannot be fully recovered.

Our Report is on the basis of the limited information provided by the company and available data on the BSE website and rest we rely on the information provided by the company in the Management Representation letter dated 30.05.2024.



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. Independent directors Mr. Anandilal and Vishandutt were appointed on 05/10/2021, and Suman Devi was appointed on 21/12/2021 as Additional Directors still they are reflecting as an addition on MCA portal and have 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. None of the Directors have got their KYC done.
3. Form GNL-2 was filed 5 times during the period under review for
 - (a) Appointment of Secretarial Auditor (MGT-14)
 - (b) Approval of Directors Report (MGT-14)
 - (c) Approval of Annual Accounts (MGT-14)
 - (d) Report of 34th AGM (MGT-15)
 - (e) Special Resolution passed in AGM for Regularzation of Director (MGT-14)
 - (f) GNL-1 for extension of AGM by 3 months.
4. As informed by the management Some ROC Filing is pending and annual filling has not been done for the last 3 years.
5. CSR Unspent amount for the preceding years has not been spent yet.
6. Details of CIRP proceedings and RP are mentioned on the website of the company and COC proceedings and meetings are not mentioned on the 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 bearing registration



No.,IBBI/PA-002/IP-N00326/2017-18/10931 under the CIRP vide NCLT, order No. NCLT/CHD/REG/901 dated 02/02/2022. As intimated, no other action has been 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.

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 and standards is the responsibility of management. Our examination was limited to the verification of procedures a 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.

**FOR SEEMA SHARMA & ASSOCIATES
COMPANY SECRETARIES**

Seema Sharma

Place: Kolkata

Date: 31.05.2024

**SEEMA SHARMA
PROPREITOR**

FCSNo.:8413/CPNo.:11118

ICSI UDIN: **F008413F000510981**

Peer Reviewed firm

