



**VST Industries Limited**

May 16, 2022

The General Manager  
Listing Department  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, Fort  
**Mumbai – 400 001**

The Manager  
Listing Department  
National Stock Exchange of India Ltd.  
“Exchange Plaza”  
Bandra Kurla Complex, Bandra (E)  
**Mumbai – 400 051**

STOCK CODE : 509966

STOCK SYMBOL : VSTIND

Dear Sir/Madam,

**Sub : Annual Secretarial Compliance Report**

In compliance with the Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, and SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, we hereby submit the Annual Secretarial Compliance Report of the Company for the year ended 31<sup>st</sup> March, 2022 issued by M/s. Tumuluru & Company, Practicing Company Secretaries.

The Annual Secretarial Compliance Report has been also submitted in XBRL mode.

Please take the same on record.

Yours faithfully,  
For VST INDUSTRIES LIMITED

  
PHANI K. MANGIPUDI  
Company Secretary and  
Head-Legal & Secretarial

Encl : As Above

Secretarial Compliance Report of  
VST Industries Limited  
For the year ended 31<sup>st</sup> March, 2022

I/We **B V Saravana Kumar**, Partner of M/s. **Tumuluru & Company.**, have examined:

- (a) all the documents and records made available to us and explanation provided by **VST Industries 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, 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; *not applicable during the period under review*;
- (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 period under review*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

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(f) Securities and Exchange Board of India (Issue and listing of Non-Convertible Securities) Regulations, 2021; *not applicable during the period under review;*

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And circulars/ guidelines issued thereunder;

and based on the above examination, I/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<br>(Regulations/ circulars / guidelines<br>including specific clause) | Deviations | Observations/ Remarks<br>of the Practicing<br>Company Secretary |
|----------------|--|------------|---|
| Not Applicable |  |            |   |

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/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 | Details of action taken<br>E.g. fines, warning<br>letter, debarment, etc. | Observations/ remarks of<br>the Practicing Company<br>Secretary, if any. |
|----------------|-----------------|----------------------|---|--|
| Not Applicable |                 |                      |   |  |

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Tumuluru & Company  
Company Secretaries

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S D Road, Secunderabad – 500 003  
Tel: 040-27815309  
Email : mrtumuluruk@gmail.com  
saravana1015@gmail.com  
Mobile: 93910 87255/79896 84305  
99893 14279

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(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 year ended 31 <sup>st</sup> March, 2021 | 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 Tumuluru & Company  
Company Secretaries



*B V Saravana Kumar*

B V Saravana Kumar  
Partner

ACS No. 26944

C. P. No. 11727

Peer Review Cert. No.: 1159/2021

UDIN: A026944D000210721

Place : Hyderabad

Date : 26<sup>th</sup> April, 2022