Date: 28th July, 2020

To
Department of Corporate Services
BSE Limited
Phiroze Jeejebhoy Towers
Dalal Street
Mumbai – 400 001

Dear Sir,

Sub: Submission of Secretarial Compliance Report under Regulation 24A of
SEBI (LODR) Regulations, 2015
Ref: Scrip Code: 512175

Please find enclosed herewith the Secretarial Compliance Report for the financial year ended
31st March, 2020 as per Regulation 24A of SEBI (LODR) Regulations, 2015 and in

This is for your information and records.

Yours faithfully,

For Vama Industries Limited

VANDANA MODANI

Vandana Modani
Company Secretary & Compliance Officer
Secretarial Compliance Report
of
VAMA INDUSTRIES LIMITED
For the Financial Year ended 31.03.2020

I, Anand Kumar C. Kasat, Practicing Company Secretary has examined:

(a) all the documents and records made available to me and explanation provided by VAMA INDUSTRIES LIMITED, having its Registered Office at Ground Floor, B-12 Madhura Nagar Hyderabad, 500038 hereinafter referred to as “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 31.03.2020 (“01.04.2019 to 31.03.2020”) 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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

(d) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - Not Applicable during the audit period.
Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - Not Applicable during the audit period

Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - Not Applicable during the audit period

Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - Not Applicable during the audit period

Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - Not Applicable during the audit period

The Depositories Act, 1996:

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;

and circulars/ guidelines issued thereunder;

and based on the above examination, I 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:-

<table>
<thead>
<tr>
<th>Sr. No</th>
<th>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</th>
<th>Deviations</th>
<th>Observations/ Remarks of the Practicing Company Secretary</th>
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<td>Not Applicable</td>
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(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 my 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:

<table>
<thead>
<tr>
<th>Sr No.</th>
<th>Action taken by</th>
<th>Details of violation</th>
<th>Details of action taken Eg. fines, warning letter, debarment, etc.</th>
<th>Observations/ remarks of the Practicing Company Secretary, if any.</th>
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</table>
(d) The Listed entity has taken the following actions to comply with the observations made in previous reports:

<table>
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<tr>
<th>Sr No.</th>
<th>Observations of the practicing Company secretary in the previous reports</th>
<th>Observation made in the Secretarial Compliance Report for the year ended</th>
<th>Action taken by the listed entity if any</th>
<th>Comments of the practicing Company secretary on the action taken by the listed entity</th>
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(e) Since the auditor has already been appointed, the terms of appointment of the auditor have been suitably modified to give effect to 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

ANAND KUMAR C. KASAT  
Practising Company Secretary  
M.No.42078  
C.P.No.7420  
UDIN: A042078B000507411  

Place: Hyderabad  
Date: 27.07.2020