

Secretarial compliance report of VST TILLERS TRACTORS LIMITED for the year ended
31st March 2022

(SEBI: CIR/CFD/CMD1/27/2019 dated 08.02.2019)

We have examined:

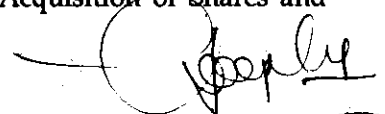
- (a) all the documents and records made available to us and explanation provided by VST TILLERS TRACTORS LIMITED ("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity,
- (d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st 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 there under; and
- (b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 there were no instances of issue of securities during review period.
- (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 there were no instances of buy back of shares during review period.

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; shall be applicable for the period beginning 1st April 2021 to 12th August 2021 and the Securities and Exchange Board of India (Share based employee benefits and sweat equity) Regulations, 2021 shall be applicable from 13th August 2021 to 31st March 2022; Not Applicable there were no instances of issue of any share-based employee benefits.

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2021; Not Applicable as the listed entity has not issued any Debt securities.

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable as the listed entity has not issued any Preference shares.

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

(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued there under;

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 there under except:

(b) The listed entity has maintained proper records under the provisions of the above regulations and circulars/ guidelines issued there under 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 there under:

Sr. No	Action taken by	Details of Violation	Details of action taken e.g. fines, warning letter, debarment, etc	Observations/remarks of the Practising Company Secretary, if any.
N.A	N.A	N.A	N.A	N.A

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

Sr. No	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the action taken by the listed entity
*	N.A.	N.A.	N.A.	N.A.

* We have reported only on observations made in previous secretarial compliance reports for which action was pending from the company at the start of current financial year. In other words, observations which have been closed by the company prior to starting of current financial year and were reported so in earlier secretarial reports, have not been reported herein above again.

For Thirupal Gorige & Associates LLP
Practising Company Secretaries



CS Thirupal Gorige
Designated Partner
FCS No. 6680; CP No.6424;
UDIN: F006680D000259493



Place: Bengaluru
Date: 03-05-2022