



To,  
BSE Limited  
P. J. Towers, Dalal Street  
Mumbai - 400001

Date: 30.05.2022

Dear Sir/ Madam,

**Sub: Annual Secretarial Compliance Report for the year ended 31.03.2022 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) (Amendment) Regulations, 2018**

**Ref: Scrip Code: 538920**

With reference to the subject cited, please find enclosed Annual Secretarial Compliance Report for the year ended 31.03.2022 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) (Amendment) Regulations, 2018.

This is for the information and records of the Exchange, please.

Thanking you.

Yours sincerely,  
**For Vintage Coffee and Beverages Limited**

**Ankit Kumar**  
**Company Secretary &**  
**Compliance Officer**  
Encl: as above



# VINTAGE COFFEE AND BEVERAGES LIMITED

Formerly known as "Spaceage Products Ltd"  
(CIN No. L15100TG1980PLC161210)

Regd. & Corporate office : 202, Oxford Plaza, No.9-1-129/1, S.D.Road, Secunderabad- 500003, Telangana, INDIA  
Phone +91 040 40266650, Fax: +91 040 27700805 | E-mail: info@vcbl.coffee | Website: www.vcbl.coffee



**Vivek Surana & Associates**  
Practicing Company Secretaries

**SECRETARIAL COMPLIANCE REPORT OF VINTAGE COFFEE AND BEVERAGES  
LIMITED  
FOR THE YEAR ENDED 31.03.2022**

We, Vivek Surana & Associates, Practicing Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by **Vintage Coffee and Beverages Limited** ("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchange,
- (c) Website of the listed entity,
- (c) 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;
- (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**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable**





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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2019; **Not Applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **Not Applicable**
- (j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable.
- (k) CIR/CFD/CMD1/114/2019 (Resignation of statutory auditors from listed entities and their material subsidiaries) – M/s TDK & Co resigned as statutory auditors w.e.f. 12.07.2021 and M/s M. Sridhar Reddy & Co were appointed as statutory auditors w.e.f. 12.07.2021. However, they resigned on 02.11.2021 and M/s S. Bhalotia & Associates were appointed as statutory auditors w.e.f. 06.11.2021. The requirements of the above said Circular were complied with.
- (l) SEBI circular HO/DDHS/CIR/P/2018/144 dated November 26, 2018 disclosure of large Corporate; **Not Applicable**

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 wherever applicable, except in respect of matters specified below:

Sl. No	Compliance requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company secretary
1.	As per Regulation 29 of SEBI LODR (Regulations) 2015 - The listed entity shall give prior intimation to stock exchange at least	Delay in furnishing prior intimation about the meeting of the board of	The Company has filed the prior intimation on 26.10.2021 (with a delay of 2 days) for the Board





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five days in advance (excluding the date of the intimation and date of the meeting) about the meeting of the board of directors for approval of financial results.	directors for the unaudited financial results for the quarter ended 30.09.2021.	Meeting held on 30.10.2021 for approval of unaudited financial results for the quarter ended 30.09.2021.
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- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued wherever applicable, there under insofar as it appears from our examination of those records.
- (c) The following are the actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under:

Sl. No	Action taken by	Details of Violation	Details of action taken E.g., fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company secretary, if any.
1.	BSE Limited	Regulation 29 – Delay in furnishing prior intimation about the meeting of the board of directors	Fine of Rs. 11,800/- (including GST) was levied by BSE.	The fine of Rs.11,800/- (including GST) was paid on 17.11.2021 to BSE.





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

Sl. No	Observations of the Practicing Company Secretary in 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				

Place: Hyderabad

Date: 29.05.2022

For Vivek Surana & Associates



Vivek Surana

Proprietor

M. No: A24531, CP No: 12901

UDIN:A024531D000421391