



SCINTILLA COMMERCIAL & CREDIT LTD.

"Mercantile Building", Block - E, 2nd Floor, 9/12, Lal Bazar Street, Kolkata - 700001

Ph.: 2248 5664, E-mail : info@scintilla.co.in, Website : www.scintilla.co.in

CIN : L65191WB1990PLC048276, Corp. Off : "Jajodia Towers", 3, Bentinck Street,
4th Floor, Room No. D-8, Kolkata - 700 001, WB

Date: 14/05/2022

To,
The Secretary,
Listing Department
BSE Limited,
P.J. Towers, Dalal Street,
Mumbai - 400 001

To,
The Secretary,
Calcutta Stock Exchange Limited
7, Lyons Range, Kolkata-700001

Scrip Code: 538857

Scrip Code: 029467

Sub: Submission of Annual Secretarial Compliance Report for the Year Ended March 31, 2022

Dear Sir/Madam,

With reference to the abovementioned subject, please find enclosed herewith the Annual Secretarial Compliance Report of Virat Leasing Limited for the year ended March 31, 2022 as certified by CS Rajesh Ghorawat, Practicing Company Secretary.

This Report has been issued in terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

This is for your information and records.

Thanking you,

Yours faithfully,

For Scintilla Commercial & Credit Ltd


Jitendra Kumar Goyal
Managing Director
DIN: 00468744

Encl: As above

RAJESH GHORAWAT

PRACTISING COMPANY SECRETARY

**68, R. K. CHATTERJEE ROAD,
KASBA BAKULTALA, 3RDFLOOR,
KOLKATA-700042
MOBILE- 9836029000
Email Id-rgadvisory18@gmail.com**

ANNUAL SECRETARIAL COMPLIANCE REPORT OF SCINTILLA COMMERCIAL & CREDIT LTD FOR THE YEAR ENDED MARCH 31, 2022

To
Scintilla Commercial & Credit Ltd
"Mercantile Building"
Block - E, 2nd Floor
9/12, Lal Bazar Street
Kolkata - 700001

I, Rajesh Ghorawat, Practising Company Secretary have examined:

- a) all the documents and records made available to me and explanation provided by **Scintilla Commercial & Credit Ltd** ("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 **March 31, 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, **to the extent of Acts / Provisions of the Acts applicable to the company** 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 to the Company during the review period)*

RAJESH GHORAWAT

PRACTISING COMPANY SECRETARY

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- 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 to the Company during the review period)*
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not Applicable to the Company during the review period)*
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not Applicable to the Company during the review period)*
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *(Not Applicable to the Company during the review period)*
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulation, 1993

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:

Sl. No.	Compliance Requirement (Regulations/Circulars/Guidelines including specific clause)	Deviations	Observations/Remarks of Practicing Company Secretary
	NIL	NIL	NIL

- 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 our examination of those records.
- c) The following are the details of action taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the

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Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sl. No.	Action Taken By	Details of Violation	Details of Action taken e.g., fines, warning letter, debarment, etc.	Observations / Remarks of Practising Company Secretary, if any
	NIL	NIL	NIL	NIL

- 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	Observation made in the Secretarial Compliance report for the year ended	Actions taken by the Listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1.	Delay of one (1) day in Compliance of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for the Half Year ended September, 2020. BSE Imposed fine on the Company through its mail pursuant SEBI Circular no. SEBI/HO/CFD/C MD/CIR/P/2020/12 dated January 22, 2020.	2021	The Company had served a letter to BSE via mail dated 28-01-2021 seeking waiver of the fine. BSE via its email dated 13-08-2021 have waived off the fine levied on the company's request for Non - Compliance of Regulation 23(9) of SEBI (LODR) Regulations, 2015	NIL

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2.	The Company had delayed in compliance of Regulation 13(3), 27(2) and 31 of SEBI (LODR), 2015 for the quarter ended 31 st March, 2020, due to the nationwide lockdown in order to stop the spread of COVID-19 Pandemic.	2021	The Company wrote a request letter to BSE Limited for waiving off the penalty. The BSE Limited had waived off the fine levied on the company in respect of said regulation and the same was reported by us in our last report dated 21/06/2021.	NIL
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Rajesh Ghorawat
Practising Company Secretary
M.No. F7226
CP No. 20897

Date: 11th May, 2022
Place: Kolkata

ICSI Peer Review No.: 1992/2022
UDIN: F007226D000303467