



भारतीय प्रतिभूति
और विनिमय बोर्ड
**Securities and Exchange
Board of India**

Deputy General Manager
Corporation Finance Department
Registration Approval and Correspondences
Division of Issues and Listing – 2
Tel. (Direct): 022 – 2644 9639
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SEBI/HO/CFD/RAC-DIL2/P/OW/2022/55261/1
October 31, 2022

Vivanza Biosciences Limited.
403, Sarthik 2,
Opp. Rajpath Club, S. G. Highway,
Ahmedabad- 380 054.

Kind Attention:- Mr. Girish Bhatt

Sub- Non- compliance with Regulation 160(f) of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018- Vivanza Biosciences Limited.

1. This has reference to your letter dated August 10, 2022 and further communications requesting SEBI to condone the non-compliance of Regulation 160(f) of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 ("ICDR Regulations") in respect of proposed issue of 47,36,000 fully convertible warrants on a preferential basis to the promoters and non-promoters.
2. In your submissions, you have stated, *inter-alia*, as under :-
 - a. The Company in its Board meeting held on May 27, 2022 had approved the issue of 47,36,000 fully convertible warrants on a preferential basis to the promoters and non-promoters.
 - b. The Company had dispatched the notice to the shareholders with regard to proposed preferential allotment on June 28, 2022 and June 29, 2022.
 - c. Due to some technical errors and glitches in internet and system, the Company could not file the application to BSE on the same date and have filed the same on the next day i.e. June 30, 2022.
3. Upon examination, it is observed that the provisions of Regulation 160(f) were contravened by the Company by not making the application seeking in-principle approval to Stock Exchanges on the same day when the notice has been sent in respect of the general meeting seeking shareholders' approval by way of special resolution.

सेबी भवन, प्लॉट सं. सी 4-ए, "जी" ब्लॉक, बान्द्रा-कुर्ला कॉम्प्लेक्स, बान्द्रा (पूर्व), मुंबई - 400 051.
दूरभाष : 2644 9950 / 4045 9950 (आई.वी.आर.एस.), 2644 9000 / 4045 9000 फैक्स : 2644 9019 से 2644 9022 वेब : www.sebi.gov.in

SEBI Bhavan, Plot No. C4-A, "G" Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051.
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अनुवर्ती :
Continuation :

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4. Above non-compliance been viewed seriously and you are hereby warned and advised to be careful in future to avoid recurrences of such lapses. Further, you are also advised to place this letter before the Board of Directors of the Company.
5. The Stock Exchanges are hereby directed to consider the above and process the application for in-principal approval, subject to the compliance with other regulatory requirements.

Yours faithfully,

Vandana Joglekar

Cc :-

Shri. Ashok Kumar Singh
Assistant General Manager,
Bombay Stock Exchange Ltd
Floor 25, P J Towers, Dalal Street,
Mumbai – 400 001, India