

**SECRETARIAL COMPLIANCE REPORT  
OF  
INANI MARBLES AND INDUSTRIES LTD.  
For The Financial Year Ended 31<sup>st</sup> March,2019**

We, M/s R.K Jain & Associates, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by M/S **INANI MARBLES AND INDUSTRIES 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 **31<sup>st</sup> March 2019** ( "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- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (repealed w.e.f 9th December,2018)
- (c) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 notified on 9<sup>th</sup> December,2018; **(Not Applicable to the Company during the review period)**
- (d) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998(repealed w.e.f. 11<sup>th</sup> September,2018); **(Not Applicable to the Company during the under review period)**
- (f) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **(Not Applicable to the Company during the under review period).**
- (g) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not Applicable to the Company during the under review period)**



**R K Jain & Associates**

Company Secretaries

5-A-25, "Shubham"

R C Vyas Colony

Bhilwara-311001

Rajasthan

+91 98 291 25844, 94 141 10844

Phone 01482-225844

Email rkjainbhilwara@gmail.com

- (h) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (**Not Applicable to the Company during the under review period**)
- (i) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (**Not Applicable as there was no reportable event during the period under review**)
- (j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (k) Securities and Exchange Board of India (Registrars to an issue and Share transfer Agents) Regulations, 1993 regarding Companies Act and dealing with client;

and circulars/ guidelines issued thereunder;

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 thereunder, **except** in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 33(3) of SEBI (LODR) Regulations, 2015 regarding Submission of Quarterly Financial Results, Limited Review Report to Stock Exchange	<b>One day Delay</b> in submission of Quarterly Financial Results to Stock Exchange: Quarter Submitted on Q 4. 17-18 31.05.2018	It shall be submit Annual Audited standalone Financial results to the stock exchange <b>within sixty days from the end of the financial year</b> along with Audit Report as applicable by listed entity.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records
- (c) No Actions has been taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard*



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

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: **NOT APPLICABLE being first report after notification of Regulation 24A of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.**

Place: Bhilwara

Date: 29<sup>th</sup> May, 2019

**For R .K. Jain & Associates**

Company Secretaries



**CS R.K. JAIN**

Proprietor

FCS - 4584

COP No.: 5866