

SECRETARIAL COMPLIANCE REPORT
OF
INANI MARBLES AND INDUSTRIES LTD.
For The Financial Year Ended 31st March, 2020

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 31st March 2020 ("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(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (repealed w.e.f 9th December, 2018)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 9th 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(e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 (repealed w.e.f. 11th September, 2018); (**Not Applicable to the Company during the under review period**)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**)



- (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.	One day Delay in submission of Quarterly Financial Results for the quarter ended 31 st December, 2019 to Stock Exchange: As Submitted on 15.02.2020	The Financial results for quarter ended 31.12.19 were not submitted within 45 days from the quarter ended to the stock exchange along with Limited Review 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)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 thereunder:

Sr. 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	One day delay in submitting Quarterly Financial results for the quarter ended 31st march,2018	Penalty of Rs. 5000 imposed by BSE	Penalty imposed by BSE of Rs. 5000/- was paid by the Company

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31/03/2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity



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 rkiainbhilwara@gmail.com

1	One day delay in submitting Quarterly Financial Results for the quarter ended 31 st March, 2018	Annual Audited standalone Financial results shall be submitted to the stock exchange within sixty days from the end of the financial year along with Audit Report as applicable by listed entity.	Penalty imposed by BSE of Rs. 5000/- was paid by the Company	Necessary Compliance has been made by the company.
---	--	---	--	--

Place: Bhilwara
Date:31.07.2020

For R.K. Jain & Associates
Company Secretaries



CS R.K. JAIN
Proprietor
FCS - 4584
COP No.: 5866
UDIN: F004584B000536412