

May 26, 2022

BSE Limited

Dalal Street Phiroze Jeejeebhoy Towers, Fort Mumbai- 400001

Scrip Code: 526705

<u>Sub: Annual Secretarial Compliance Report for the financial year ended</u> <u>March 31, 2022</u>

Dear Sir,

In terms of Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report of Elegant Marbles and Grani Industries Limited dated May 25, 2022, for the financial year ended March 31, 2022, issued by Mr. Parbat V. Chaudhari, Practicing Company Secretary.

This is for your information and records.

Thanking you.

For Elegant Marbles and Grani Industries Limited

Arpita Doshi Company Secretar

ACS-45554

A. H. DOSW

Encl: as above









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CS Parbat Chaudhari

Practicing Company Secretary

SECRETARIAL COMPLIANCE REPORT OF ELEGANT MARBLES AND GRANI INDUSTRIES LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022

- 1. I, Parbat V. Chaudhari, Practicing Company Secretary, have examined:
 - (a) All the documents and records made available to me and explanation provided by Elegant Marbles and Grani Industries Limited having CIN: L14101RJ1984PLC003134 ("the listed entity") arising from the compliances of specific Regulations listed under Clause 2 of this report;
 - (b) the filings / submissions made by the Listed Entity to the Stock Exchange in connection with the above;
 - (c) website of the Listed Entity; and
 - (d) all other documents, fillings or submissions on the basis of which this certification is given,

for the financial year ended 31st 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");
- 2. The specific Regulations, whose provisions and the Circulars / Guidelines issued thereunder, have been examined, include:-
 - (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not Applicable during the review period);

- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not Applicable during the review period);
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and the Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable during the review period);
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008, the Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 and the Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 – (Not applicable during the review period);
- (g) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client (Not applicable during the review period);

and based on the above examination, I hereby report that, during the Review Period:

(a) The Listed Entity has prima facie complied with the applicable provisions of the above Regulations and Circulars / Guidelines issued thereunder except in respect of matters specified below:

Sr.	Compliance Requirement	Deviations	Observations / Remarks of		
No.	(Regulations / circulars / guidelines including specific		the Practicing Company Secretary		
	clause)		•		
-	•	•	-		



- (b) The Listed Entity has prima facie maintained proper records under the provisions of the above Regulations and Circulars / Guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) The following are the details of actions taken against the Listed Entity / its Promoters / Directors either by the SEBI or by the Stock Exchange (including under the Standard Operating Procedures issued by the SEBI through various Circulars) under the aforesaid Acts / Regulations and Circulars / Guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	taken E.g. fines,	Observations/ remarks of the Practicing Company Secretary, if any.	
Ē	N.A.	N.A.	N.A.	N.A.	

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

Sr.	Observations of	Observations	Actions	Comments of the
	the Practicing Company	made in the secretarial	taken by	Practicing
	Secretary in the previous reports	DATA CANAL CONTROL OF STREET CONTROL AND CONTROL OF STREET	And the second second second	Secretary on the actions taken by the listed entity
-:	None	N.A.	N.A.	N.A.

(e) I have conducted online verification and examination of records, as facilitated by the Company due prevailing conditions owing to Covid-19 for the purpose of issuing this report.

Date: 25th May, 2022

Place: Gujarat

Parbat V. Chaudhari SECRETA

Practicing Company Secretary ACS No.: 57826 / COP No.: 22429 Peer Review Cert. No.: 1575/2021

UDIN: A057826D000385274