

# ANIL SOMANI & ASSOCIATES

Company Secretaries

D-94, 1st Floor, Indra Market, Bhilwara, Rajasthan - 311001

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## **Secretarial compliance report of Inani Marbles & Industries Ltd.**

**for the year ended 31<sup>st</sup> March, 2021**

1. We have examined:-

- (a) all the documents and records made available to us and explanation provided by ***Inani Marbles & 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, 2021 ("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) 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;
- (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; **N.A.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **N.A.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **N.A.**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **N.A.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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:

<b>Sr. No.</b>	<b>Compliance Requirement (Regulations/circulars/Guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations/Remarks of the Practicing Company Secretary</b>
1.	<i>Regulation 30 and Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</i>	<i>Delayed filing of outcome of Board Meeting held on 30.06.2020</i>	<i>The company has filed outcome of Board Meeting held on 30.06.2020 delayed by 10 minutes.</i>
2.	<i>Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015</i>	<i>Delayed filing of intimation of closure of trading window</i>	<i>The listed entity has filed intimation of closure of trading window for the quarter ended 31.03.2020 on 07.04.2020</i>

- (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 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:

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/Remarks of the Practicing Company Secretary, if any</b>
<b>Not applicable</b>				

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

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
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 Result for the quarter ended 31 <sup>st</sup> December, 2019 to Stock Exchange : As submitted on 15.02.2020	The Financial results for quarter ended 31.12.2019 were not submitted within 45 days from the quarter ended to the stock exchange along with Limited Review Report as applicable by listed entity.

For **Anil Somani & Associates**  
Company Secretaries

**ANIL KUMAR SOMANI**  
Digitally signed by  
ANIL KUMAR SOMANI  
Date: 2021.06.18  
14:47:11 +05'30'

**Anil Kumar Somani**

**ACS: 36055**

**COP: 13379**

**UDIN: A036055C000481148**

Place: Bhilwara

Date: 18<sup>th</sup> June, 2021