

**SECRETARIAL COMPLIANCE REPORT OF
MADHAV MARBLES AND GRANITES LIMITED**

(For the year ended 31.03.2022)

(Pursuant to SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019)

I M/s Ronak Jhuthawat & Co. have examined:

- A. All the documents and records made available to us and explanation provided by **MADHAV MARBLES AND GRANITES LIMITED** (CIN: L14101RJ1989PLC004903) ("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 31.03.2022 ("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");

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- **Not applicable during the review period.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not applicable during the review period.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable during the review period.**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not applicable during the review period.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) 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 financial year under review;**



And based on the above examination, I hereby report that, during the review period:

(a) The listed entity has maintained proper records under 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
NA	NA	NA	NA

(b) Following action has been 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:

S. 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	NATIONAL STOCK EXCHANGE AND BOMBAY STOCK EXCHANGE	Non-compliance with Regulation 29 of SEBI (LODR) Regulations, 2015 ("Listing Regulations")	The company has not complied with the Regulation 29(2) of SEBI (LODR) Regulations, 2015 for which the Total fine was imposed by the NSE and BSE of Rs. 11800/- on the company respectively.	<p>The company has received a notice from NSE via notice number NSE/LIST-SOP/COMB/FINES/0818 dated 14th July, 2021, for levying a fine of Rs. 11800/- on the company for Non-compliance with Regulation 29 of SEBI (LODR) Regulations, 2015. The company has paid a total fine of Rs. 11800/- to the NSE on 05/12/2021</p> <p>The company has also received a notice from BSE via Mail Ref SOP-CReview-July2021 dated July 14, 2021, for levying a fine of Rs. 11800/- on the company for Non-compliance with Regulation 29 of SEBI (LODR) Regulations, 2015.</p> <p>The company has made a fee waiver application to the BSE whose response of acceptance/rejection is pending from the BSE.</p>
2	NATIONAL STOCK EXCHANGE AND BOMBAY STOCK EXCHANGE	Non-compliance with SEBI (LODR) Regulations, 2015 ("Listing Regulations")-	The company has not complied with Regulations 18 and 20 of SEBI (LODR) Regulations, 2015 for which the Total fine was imposed by the NSE and BSE of Rs. 108560/- on the company	<p>The company has received a notice from NSE via Letter Ref No. NSE/LIST-SOP/COMB/FINES/0815 dated 17th May, 2021, for levying a fine of Rs. 108560/- on the company for Non-compliance with Regulations 18 and 20 of SEBI (LODR) Regulations, 2015.</p> <p>The company has also received a notice from BSE through mail Ref: SOP-</p>



			respectively.	CReview-May2021, dated May 17, 2021 for levying a fine of Rs. 108560/- on the company for Non-compliance with Regulations 18 and 20 of SEBI (LODR) Regulations, 2015.
				The company has made a fee waiver application to the BSE and NSE whose response of acceptance/rejection is pending to be received from the BSE and NSE.

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

S. no.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...(The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
		Not Applicable		

Place: Udaipur
Date: 23.05.2022



For Ronak Jhuthawat & Co.

Ronak Jhuthawat
Ronak Jhuthawat
Proprietor

FCS: 9738 CP: 12094
Peer Review No. S2013RJ222900
UDIN- F009738D000367612