



GLITTEK

GLITTEK GRANITES LTD

"Krishna", 7th Floor, 224, A.J.C. Bose Road, Kolkata - 700 017, India
Phone : 2287-7892, 2290-7902. Fax : (91)(33) 2287-8577

CIN : L14102KA1990PLC023497

22/06/2020

The officer,
The Stock Exchange, Mumbai
The Corporate Relation Department,
25th Floor,, New Trading Ring,
Rotunda Building, P.J.Towers
Dalal Street, Mumbai-400 001
Fax022 22722037/39/41/61
Security Code: 513528

Dear Sir,

**Sub: Submission of Annual Secretarial Compliance Report for the year ended
31.03.2020**

Ref: SEBI circular CIR/CFD/CMPI /27 /2019 dated February 8, 2019

In compliance of Regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015, Board had appointed M/s S.M.Gupta & Co. Practicing Company Secretaries, Kolkata as Secretarial Auditor of the Company for the financial year ended 31st March 2020.They had carried out the secretarial audit and submitted Annual Secretarial Compliance Report. With reference to the SEBI circular CIR/CFD/CMD I /27 /2019 dated February 8, 2019, we have enclosed the Annual Secretarial Compliance Report for the year ended 31.03.2020.

This is for your information and records.

Thanking You,

Yours faithfully,
For Glittek Granites Limited

LATA BAGRI
(Company Secretary)

Encl:a/a

Fax : (033) 2236-7135
Email : smguptaandco@yahoo.com
smguptaandco@gmail.com
Website : www.smguptaco.com

Offi. : 2236 1385,2236 7135
Phones : Resi. : 2534 8148
Mobile : 98300 57568

S. M. GUPTA & CO.
COMPANY SECRETARIES
P-15 BENTINCK STREET, CALCUTTA-700 001

Ref. No.....

Dated.....

Secretarial Compliance Report of
GLITTEK GRANITES LIMITED
For the year ended 31.03.2020

TO THE MEMBERS OF
GLITTEK GRANITES LIMITED

We, **S. M. Gupta & Co**, Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **GLITTEK GRANITES LIMITED** ("the listed entity") having **CIN: L14102KA1990PLC023497** and Registered office at 42, K. I. A. D. B. Industrial Area, Hoskote, Bangalore, Karnataka- 562 114, along with address other than Registered Office at 224, A. J. C. Bose Road, Kolkata- 700 017
- (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, including by way of remote audit,

for the year ended **31.03.2020** ("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, as amended (LODR); **as mentioned below.**

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- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not applicable during the year under review.**
- (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 year under review.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not applicable during the year under review.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable during the year under review.**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not applicable during the year under review.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;

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:-

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| Sr. No. | Compliance Requirement (Regulations/ circulars / guidelines including specific clause) | Deviations | Observations/ Remarks of the Practicing Company Secretary |
|----------------|---|---|---|
| 1 | Regulation 31 of SEBI (LODR) Regulations, 2015 | Non submission of Share Holding pattern for Q.E. 31.03.2020 within the prescribed period | a. The Company has requested the BSE to waive the fine in view of intense glooming situation. The whole world is facing unprecedented suffering due to Corona pandemic. Lockdown is still continuing and in this helpless situation matter requires reconsideration. b. The Company has also requested SEBI to suo-moto intervene in the matter in view of situation of global pandemic. |
| 2 | Regulation 13(3) of SEBI (LODR) Regulations, 2015 | Non submission of the statement of Investor complaints for Q.E. 31.03.2020 within the prescribed period | a. The Company has requested the BSE to waive the fine in view of intense glooming situation. The whole world is facing unprecedented suffering due to Corona pandemic. Lockdown is still continuing and in this helpless situation matter requires reconsideration. b. The Company has also |

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| | | | |
|---|---|--|---|
| | | | requested SEBI to suo-moto intervene in the matter in view of situation of global pandemic. |
| 3 | Regulation 27(2) of SEBI (LODR) Regulations, 2015 | Late submission/ non submission of Corporate Governance Compliance Report for Q.E. 31.03.2020 within the prescribed period | a. The Company has requested the BSE to waive the fine in view of intense glooming situation. The whole world is facing unprecedented suffering due to Corona pandemic. Lockdown is still continuing and in this helpless situation matter requires reconsideration. b. The Company has also requested SEBI to suo-moto intervene in the matter in view of situation of global pandemic. |

- (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:

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| 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 | Non submission of Share Holding pattern for Q.E. 31.03.2020 within the prescribed period | Fine of Rs. 32,000/- + GST levied on the Company | This is purely a technical and un-intentional violation. In view of the COVID-19 situation where saving of life of humans is a priority, the Regulatory Authority can reconsider the issue. |
| 2 | BSE | Non submission of the statement of Investor complaints for Q.E. 31.03.2020 within the prescribed period | Fine of Rs. 16,000/- + GST levied on the Company | This is purely a technical and un-intentional violation. In view of the COVID-19 situation where saving of life of humans is a priority, the Regulatory Authority can reconsider the issue. |
| 3 | BSE | Late submission/ non submission of Corporate Governance Compliance Report for Q.E. 31.03.2020 within the prescribed period | Fine of Rs. 22,000/- + GST levied on the Company | This is purely a technical and un-intentional violation. In view of the COVID-19 situation where saving of life of humans is a priority, the Regulatory Authority can reconsider the issue. |

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

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| Sr. 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 |
|----------------|---|---|---|---|
| 1 | NA | NA | NA | NA |

Since there were no observations in the report for the previous year, the question of any action taken by the listed entity did not arise.

This Report is being issued under the conditions of lockdown due to COVID-19 with limited resources available to us.

Place: Kolkata

Date: 19.06.2020

Sd/-
(S. M. Gupta)
Partner
S. M. GUPTA & CO.
Company Secretaries
Firm Registration No.: P1993WB046600
Membership No: FCS – 896
CP No.: 2053
Peer Review No: 718/2020
UDIN: F000896B000356152