

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

30/07/2021

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 <u>Security Code: 513528</u>

Dear Sir,

Sub: Submission of Annual Secretarial Compliance Report for the year ended 31.03.2021 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 Kriti Daga Practicing Company Secretaries, Kolkata as Secretarial Auditor of the Company for the financial year ended 31st March 2021. 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 31.03.2021.

This is for your information and records.

Thanking You,

Yours faithfully, For Glittek Granites Limited

Jeegu

LATA BAGRI (Company Secretary)



ANNUAL SECRETARIAL COMPLIANCE REPORT OF GLITTEK GRANITES LTD. FOR THE FINANCIAL YEAR ENDED ON 31st MARCH 2021

To The Members of Glittek Granites Ltd.

I, Kriti Daga, Practicing Company Secretary, have examined:

- a) All the documents and records made available to us and explanations provided by the Company;
- b) the filings/submissions made by the company to the Stock Exchanges;
- c) Website of the Company;
- d) Any other documents/filings, as may be relevant, which has been relied upon to prepare this Certificate.

For the financial year ended on March 31, 2021 in respect of Compliance with the provisions of:

- 1. The Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the Regulations, Circular, Guidelines issued thereunder and;
- 2. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under and the Regulations, Circular, Guidelines issued thereunder by the Securities & Exchange Board of India (SEBI);

The specific Regulations whose provisions and the Circulars/Guidelines issued thereunder have been examined, includes -

- a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 : as mentioned below
- b) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- d) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; Not Applicable for the period
- e) The Securities and Exchange Board of India (Share Based Employees Benefits) Regulations, 2014; Not Applicable for the period
- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable for the period
- g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable for the period



- h) 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;
- i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; Not Applicable for the period
- j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- k) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; Not Applicable for the period

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.
- 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 examinations of those records.
- c) The following are the details of actions taken against the Company, its Promoters, Directors, either by the 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 there under –

Sr. No.	Action Taken by	Details of Violation	Details of action/ Observations/ violation taken E.g. fines, remarks of the warning letter, debarment, etc.	Observations/ Remarks of the Practicing Company Secretary, if any
1.	BSE	Regulation 13(3) Late submission of Statement of Investors Complaints for QE 31.03.2020	Imposition of Fine of Rs. 16000/-+ GST levied on the Company	Revoked by BSE
2.	BSE	Regulation 27(2) Late submission of Corporate Governance compliance Report for QE 31.03.2020 2020	Imposition of Fine of Rs. 22,000/-+GST levied on the Company	The Company has requested the BSE to waive the fine in view of intense glooming situation. This is purely a technical and un-intentional violation. This is an act of GOD.
3.	BSE	Regulation31,LatesubmissionofShareholdingPatternQE 31.03.2020	Imposition of Fine of Rs. 32000/-+ GST levied on the Company	Revoked by BSE



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4.	BSE	Regulation 33, Non-	Imposition of Fine of Rs.	The Company
		submission of Financial	80,000/-+ GST levied on	has requested the
		results for the quarter	the Company	BSE to waive the
		ended 31.03.2020		fine in view of
				intense glooming
				situation. This is
				purely a technical
				and un-intentional
				violation. This is
				an act of GOD.

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

Sr.	Observations of the	Observations made in the	Actions taken	Comments of the				
No.	Practicing	secretarial compliance	by the listed	Practicing Company				
	Company Secretary	report for the Year ended	entity, if any	Secretary on the				
	in the previous	31 st March 2020		actions taken by the				
	reports			Listed Entity				
Not Applicable in regard to previous Audit Report								

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

KRITI DAGA

Practicing Company Secretary ACS No.: A26425, C. P. No. 14023

Place: Kolkata Date: 29.07.2021

UDIN: A026425C000707842