



## GRAVITA INDIA LTD.

Corp. Office : 402, Gravita Tower, A-27 B, Shanti Path,  
Tilak Nagar, JAIPUR-302 004, Rajasthan (INDIA)  
Phone : +91-141- 2623266, 2622697 FAX : +91-141-2621491  
E-mail : info@gravitaindia.com Web. : www.gravitaindia.com  
CIN : L29308RJ1992PLCO06870

Date: 25<sup>th</sup> May, 2019

GIL/2019-20/018

To

The BSE Ltd.  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai – 400 001  
Fax No.: 022 22722041  
Ref: Company Code: 533282

The Listing Department  
The National stock Exchange of India Ltd.  
Exchange Plaza, C-1, Block-G,  
Bandra - Kurla Complex, Bandra (E)  
Mumbai- 400 051  
Fax No.: 022-26598237/38  
Ref: Company Code: GRAVITA

### Sub: Annual Secretarial Compliance Report for the Financial Year 2018-19

Dear Sir/Madam,

Pursuant to SEBI circular no. CIR/CFD/CMD 1/27/2019 dated 08.02.2019, please find the enclosed herewith the Annual Secretarial Compliance Report dated 25<sup>th</sup> May, 2019 for the Financial Year 2018-19 issued by M/s. P Pincha & Associates Practicing Company Secretaries.

Kindly take the above on record and oblige.

Yours Faithfully,

For Gravita India Limited

  
**Nitin Gupta**  
Company Secretary  
FCS: 9984



Encl.: As above



# P. Pincha & Associates

## Company Secretaries

Secretarial compliance report of Gravita India Limited for the year ended 31<sup>st</sup> March, 2019

I, Pradeep Pincha, proprietor of M/s. P. Pincha & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **Gravita India Limited** ("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, 2019 ("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:-

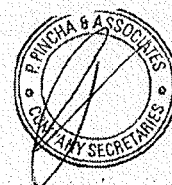
- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (d) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (e) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (f) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999/ The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014

**(Note: The aforesaid list of SEBI Regulations is only the list of regulations which were applicable to the listed entity for the review period.)**

and based on the above examination, I 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.

108, 1st Floor, Shree Mansion, G-23, Kamla Marg, Behind Rajdhani Hospital, C-Scheme, Jaipur 302001, Rajasthan  
Tel.: 91-0141 4106355 | Email: [ppincha@gmail.com](mailto:ppincha@gmail.com) | [www.pincha.com](http://www.pincha.com)





# P. Pincha & Associates

Company Secretaries

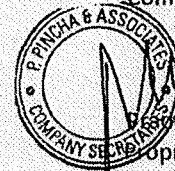
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ 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:

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.
-----NIL-----				

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable**

Dated: 25/05/2019  
Place: Jaipur

For P. Pincha & Associates  
Company Secretaries



Deep Pincha  
Proprietor  
M. No.: FCS 5369  
C. P. No.: 4426