

**Annual Secretarial Compliances Report of Aro granite industries limited for the Year ended 31<sup>st</sup> March 2021**

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019, for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

I have examined

- All documents and records made available to me and explanation provided by **Aro granite industries limited.**
- Filings/submissions made by the listed entity to the stock exchanges
- Website of listed entity
- Any other document /filing as may be relevant, which has been relied upon to make this certification.

for the year ended 31.03.2021 in respect of compliance with the provisions of

- Securities and Exchange Board of India 1992 (SEBI Act) and the Regulations/Circulars/guidelines issued thereunder: and
- Securities Contracts (Regulation) Act 1956 (SCRA) rules made thereunder and the regulations, circulars/guidelines issued by the Securities and Exchange Board of India (SEBI).

The Specific Regulations, whose provisions and the Circulars/guidelines issued thereunder have been examined include:

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015
- The Securities and Exchange Board of India (Issue of capital and Disclosure Requirements) Regulation Act 2018. ( **Not applicable during the year under review** )
- The Securities and Exchange Board of India Exchange (Substantial Acquisition of shares and Takeovers) Regulations 2011. ( **Not applicable during the year under review** )
- The Securities and Exchange Board of India (Buyback of securities) Regulations, 2018 ( **Not applicable during the year under review** )
- The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations 2014. ( **Not applicable during the year under review** )



- f. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations 2008.  
**(Not applicable during the year under review)**
- g. The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulation 2013.**(Not applicable during the year under review)**
- h. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015.

And circulars/guidelines issued thereunder:

And based on the above examination,I/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:

Si.No.	Compliance Requirement(Regulations/circulars/guidelines Including specific clause)	Deviation	Observations/Remarks of the Practicing Company Secretary
	NIL	NIL	NIL

- (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 Exchange(s) (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issued thereunder:

Sl.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	NIL	NIL	NIL

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

Sl.No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial compliance report for the year ended---	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity.
	NIL	NIL	NIL	NIL

Place: New Delhi  
Date: 17<sup>th</sup> June 2021  
COP 3074

UDIN: A012120C000476386



*Latika Jetley*  
Latika Jetley  
Practicing Company Secretary  
ACS 12120