



— Beautiful Life —

June 18, 2021

To,
Corporate Relations Department,
Bombay Stock Exchange Limited,
2nd Floor, P.J Towers,
Dalal Street,
Mumbai-400 001

To,
Corporate Relations Department
National Stock Exchange of India Ltd.
Exchange Plaza,
Plot No., C/1, G-Block,
Bandra Kurla Complex, Bandra (E),
Mumbai – 400 051

Scrip Code: 532888

Scrip Code: ASIANTILES

Dear Sir,

Subject: Annual Secretarial Compliance Report for the year ended 31st March, 2021.

In compliance of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended read with SEBI Circular No. CIR/CFD/CMD1/2712019 dated 8th February, 2019, we are enclosing herewith Annual Secretarial Compliance Report for the year ended 31st March, 2021, issued by M/s Rajesh Parekh & Co., Company Secretary, Ahmedabad.

Request you to take note of the same.

Thanking you.

Yours faithfully,

For Asian Granito India Limited



Kamleshbhai B Patel
Chairman and Managing Director
DIN: 00229700

Regd. & Corp. Office:
202, Dev Arc, Opp. Iskcon Temple,
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CIN : L17110GJ1995PLC027025

TILES | MARBLE | QUARTZ | BATHWARE



Asian Granito India Ltd.



**Secretarial Compliance Report of Asian Granito (India) Limited
(CIN: L17110GJ1995PLC027025) for the year ended 31st March, 2021**

I, Rajesh Parekh, Practicing Company Secretary has examined*:

- (a) all the documents and records made available to us and explanation provided by Asian Granito (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 31st March, 2021 in respect of compliance with the provisions of:

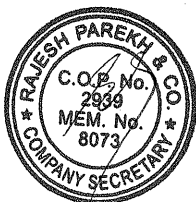
- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities 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 period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
(Not applicable during the period)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
(Not applicable during the period)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
(Not applicable during the period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;

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, 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
NIL			

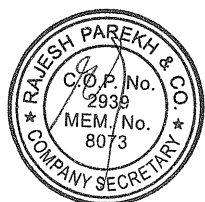
(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my/our examination of those records.

(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:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observation s/ 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:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the said report for the year ended	Actions taken by the listed entity, if any	Comments of Practicing Company Secretary on the actions taken by the listed entity
1	Regulation 7(2)(a) of PIT Every Promoter, member of promoter group, designated person and directors shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter,	2019-20	One of the inactive Promoter traded inadvertently during closed trading window. Company sought clarification from concerned promoter and after considering the gravity of default, the Company had imposed penalty of ₹ 10,000 which has been deposited to SEBI IPEF account.	



aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified.

2	Regulation 9(1) of PIT The board of directors of every listed company and the Board or head(s) of the organisation of every intermediary shall ensure that the CFO or MD shall formulate a code of conduct with their approval to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons towards achieving compliance with these regulations, adopting the minimum standards set out in Schedule B (in case of a listed company) and Schedule C (in case of an intermediary) to these regulations, without diluting the provisions of these regulations in any manner	2019-20	Company sought clarification from concerned designated persons and after considering the gravity of default, the Company had imposed total penalty of 35,000/- which has been deposited to SEBI IPEF account. The Company has also received an undertaking from two designated persons assuring that they will take sufficient care that such transactions will not happen in future and will abide by Code of Conduct and SEBI (PIT) Regulations, 2015
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* I have conducted physical as well as online verification and examination of records, as facilitated by the Company due to Covid 19 pandemic for the purpose of issuing this report.

**For Rajesh Parekh & Co.
Company Secretary**


Rajesh Parekh

Proprietor

Mem. No.: 8073

C.O.P. No.: 2939

UDIN: A008073C000402907

Date: 31-05-2021

Place: Ahmedabad

