



**REGISTERED OFFICE**

**GRANULES INDIA LTD.**, 2nd Floor, 3rd Block, My Home Hub,  
Madhapur, Hyderabad - 500 081, Telangana, INDIA.  
Tel: +91 40 30660000, Fax: +91 40 23115145, mail@granulesindia.com, www.granulesindia.com  
CIN: L24110TG1991PLC012471

**Date: April 26, 2019**

To,  
BSE Limited  
National Stock Exchange of India Limited  
**Scrip Code: 532482 Symbol: GRANULES**

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report under Regulation 24A for the FY 2018-19.**  
**Ref: CIR/CFD/CMD1/27/2019 dated: February 8, 2019**


We are herewith submitting the Annual Secretarial Compliance Report issued by M/s Saurabh Poddar & Associates, Company Secretaries in compliance with Regulation 24A of SEBI (LODR) Regulation, 2015 for the FY 2018-19.

Kindly take the above information on record.

Thanking you,

Yours Faithfully,

**FOR, GRANULES INDIA LIMITED.**

*Chaitanya Tummala*  
  
**(CHAITANYA TUMMALA)**  
**COMPANY SECRETARY &**  
**COMPLIANCE OFFICER**

Encl: As Above.



**SECRETARIAL COMPLIANCE REPORT OF GRANULES INDIA LIMITED [ CIN :-  
L24110TG1991PLC012471] FOR THE YEAR ENDED 31<sup>ST</sup> MARCH 2019**

I, have examined:

- (a) all the documents and records made available to us and explanation provided by **Granules India Limited [ CIN :- L24110TG1991PLC012471]** (“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:-

1. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
2. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
3. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
4. 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.
- 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. ***There are no such instances which are to be reported.***
- d) The listed entity has taken the following actions to comply with the observations made in previous reports: ***There are no such instances.***



*S. Poddar*

**Saurabh Poddar**  
FCS No. 9190  
C P No.: 10787

**Place: Hyderabad**  
**Date: 26-04-2019**