

Aro granite industries ltd.

Regd. Office: 1001, 10th Floor, DLF Tower A, Jasola, New Delhi - 110 025. Phone: 91-11-41686169, Fax: 91-11-26941984, E-mail: arodelhi@arotile.com

Date: 28.05.2019

Bombay Stock Exchange Limited Department of Corporate Services Floor 25, P.J. Towers Dalal Street Mumbai 400001 (SCRIP CODE: 513729) National Stock Exchange of India Limited Listing Department 5th Floor, Exchange Plaza Bandra (E) Mumbai 400051 (SCRIP CODE: AROGRANITE/EQ)

Sub.: Annual Secretarial Compliance Report of the Company for the year ended 31.03.2019

Ref.: SEBI Circular CIR/CFD/CMD1/27/2019 dated 08.02.2019

Dear Sir,

With reference to the above circular, please find enclosed herewith the Annual Secretarial Compliance Report for the year ended 31.03.2019

Kindly take the above in your record.

Thanking you,

Yours faithfully For Aro granite industries Itd.

Company Secretary

Encl.: as above







B-28, SARVODAYA ENCLAVE New Delhi - 110017

Ph: 26858230

Secretarial Compliances Report of Aro granite industries limited for the Year ended 31st March 2019

I have examined

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

For the year ended 31.03.2019 in respect of compliance with the provisions of

- (a) Securities and Exchange Board of India 1992 (SEBI Act) and the Regulations, Circulars/guidelines issued thereunder: and
- (b) Securities Contracts (Regulation) Act 1956 (SCRA) rules made there under 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 there under have been examined include:

- a. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)
 Regulations 2015
- b. The Securities and Exchange Board of India (Issue of capital and Disclosure Requirements) Regulation Act 2018.
- c. The Securities and Exchange Board of India Exchange (Substantial Acquisition of shares and Takeovers) Regulations 2011.
- d. The Securities and Exchange Board of India (Buyback of securities) Regulations,2018 (Not Applicable during the year)
- e. 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 20

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 there under, except in respect of matters specified below:

| Si. No. | Compliance Requirement (Regulations /circulars | Deviation | Observations/Remarks of the | | |
|---------|--|-----------|------------------------------|--|--|
| | /guidelines Including specific clause) | | 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 there under 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 there under:

| Sl. No. | Action taken by | Details of violation | Details of act | tion | Observations/remarks | |
|---------|-----------------|----------------------|-----------------|------|----------------------|------------|
| | | | taken e.g. fii | nes | of the | Practicing |
| | | | warning let | tter | Company | Secretary, |
| | | | debarment, etc. | | if any | |
| | NIL | NIL | NIL | | NIL | |

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

| Sr. No. | Observations of | Observations made in the | Actions taken by | Comments of the |
|---------|------------------|-------------------------------|-----------------------|----------------------|
| | the Practicing | Secretarial compliance report | the listed entity, if | Practicing Company |
| | Company | for the year ended | any | Secretary on the |
| 13 | Secretary in the | | • <u>`</u> | actions taken by the |
| | previous | | | listed entity. |
| | reports | and the second second | • | |
| | NIL | NIL | NIL | NIL |

Place: New Delhi Date: 28th May 2019

Latika Jetley Practicing Company Secretary

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