



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 : L29308RJ1992PLC006870

08th June, 2021

GIL/2021-22/109

To, 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 Company Code: GRAVITA	To The BSE Ltd. Phiroze Jeejeebhoy Towers Dalal Street MUMBAI-400001 Fax No.: 02222723121 Company Code: 533282
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Sub: Annual Secretarial Compliance Report for the Financial Year 2020-21

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read along with SEBI circular no. CIR/CFD/CMD I /27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report dated 11th May, 2021 for the Financial Year 2020-21 issued by M/s. P. Pincha & Associates, Practicing Company Secretaries.

Kindly take the above on your records and oblige.

Yours Faithfully

For **Gravita India Limited**


Nitin Gupta
(Company Secretary)
FCS: 9984





P. Pincha & Associates

Company Secretaries

To,
The Board of Directors,
Gravita India Limited
'Saurabh', Chittora Road, Harsulia Mod,
Diggi Malpura, Tehsil-Phagi,
Jaipur-303 904 (Rajasthan)

Reg: Annual Secretarial Compliance Report for the Financial Year 2020-21

Sir/ Madam,

We have been engaged by **Gravita India Limited** (hereinafter referred to as 'the Company') whose equity shares are listed on National Stock Exchange of India Limited and BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisos of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.
Thane

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For **P. Pincha & Associates**
Company Secretaries

PRADEEP
P
PINCHA

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

Dated: 11.05.2021
Place: Jaipur



P. Pincha & Associates

Company Secretaries

Secretarial compliance report of Gravita India Limited for the year ended 31st March, 2021

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 31st March, 2021 ("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.)



P. Pincha & Associates

Company Secretaries

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 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**

For P. Pincha & Associates
Company Secretaries

PRADEEP
PINCHA

Practising Agent by PRADEEP
PINCHA
C.No. 08/PRADEEP PINCHA, C.No.
10/JAIPUR, RAJASTHAN
REGISTRATION NO. RAJ20141322106012
PINDENREG000008085000000010
CIN: 114220719
DIN: 00216611 1023 44 10520

Pradeep Pincha
Proprietor

M. No.: FCS 5369
C. P. No.: 4426

Dated: 11.05.2021
Place: Jaipur
UDIN: F005369C000307451