



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

Date: 20th July, 2020
GIL/2020-21/014

To,

The BSE Ltd.
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai - 400 001
Fax No.: 022 22722041
Ref: Company Code: 533282

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
Ref: Company Code: GRAVITA

Sub: Annual Secretarial Compliance Report for the Financial Year 2019-20

Dear Sir/Ma'am,

Pursuant to SEBI circular no. CIR/CFD/CMD 1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report dated 4th June, 2020 for the Financial Year 2019-20 issued by M/s. P. Pincha & Associates, Practicing Company Secretaries.

Kindly take the above on record and oblige.

Yours Faithfully,
For **Gravita India Limited**

Nitin Gupta

Nitin Gupta
Company Secretary
FCS: 9984



Encl. as above



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 2019-20

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.

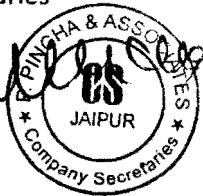
It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

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



Dated: 04/06/2020

Place: Jaipur



P. Pincha & Associates

Company Secretaries

Secretarial compliance report of Gravita India Limited for the year ended 31st March, 2020

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,

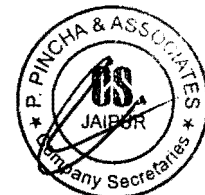
for the year ended 31st March, 2020 ("Review Period") in respect of compliance with the provisions of:

- (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:

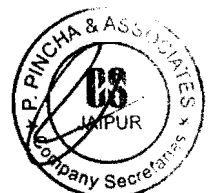
- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/circulars /guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated September 9, 2015	The Board of Directors of the Company at their meeting held on 21 st March, 2020 has decided to sell its investment in one of the partnership firm named as "Gravita Metals", J&K. This intimation was made on 21 st May, 2020 to respective stock exchange(s).	Due to ongoing Covid-19 pandemic and lockdown, the intimation was delayed and has not been intimated within the timelines prescribed in regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

- (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 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**





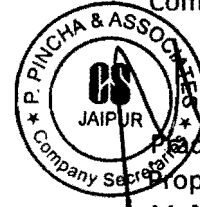
P. Pincha & Associates

Company Secretaries

- (e) Since the auditor has already been appointed, the terms of appointment of the auditor has been suitably modified to give effect to 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Dated: 04/06/2020
Place: Jaipur
UDIN: F005369B000317153

For P. Pincha & Associates
Company Secretaries



[Handwritten Signature]
P. Deep Pincha
Proprietor

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