



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF DIVYASHAKTI  
GRANITES LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2020**

To  
Divyashakti Granites Limited  
7-1-58, Divyashakthi Apartments  
Ameerpet, Hyderabad-500016, Telangana

We, Puttaparthi Jagannatham & Co., a firm of Practicing Company Secretaries, Hyderabad have examined:

- a) All the documents and records made available to us and explanation provided by Divyashakti Granites 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 31<sup>st</sup> 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; (As amended up to date)
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **-Not Applicable during the period under review**
- (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 under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **-Not Applicable during the period under review**



(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not Applicable during the period under review**

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - **Not Applicable during the period under review**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and based on the above examination, 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.

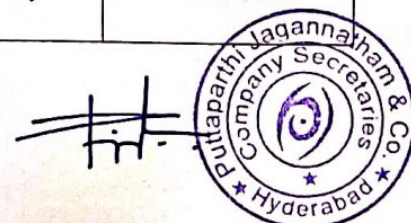
(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.

(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/ Remarks of Practicing Company Secretary, if any.
Nil	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 the practicing company secretary in the previous reports	Observations made in the secretarial compliance report for the previous year	Action taken by the listed entity, if any	Comments of the practicing company secretary on action taken by the listed entity
1	The Company Secretary & Compliance Officer of the Company resigned from the Company w.e.f 31/07/2018 and there was casual vacancy which was duly filled up by the Company with the appointment of new	There was casual vacancy in the office of Company Secretary & Compliance Officer from July 31, 2018 to February 17,	Appointment was made and vacancy was filled on finding a suitable candidate willing to join the Company	Due to casual vacancy, the non-compliance existed which was however rectified on appointment of new candidate



	Company Secretary & Compliance Officer w.e.f 18 <sup>th</sup> February, 2019	2019 and the Managing Director was acting as the Compliance officer during the said period of casual vacancy		
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Place: Hyderabad

Date: 25.06.2020

UDIN: F009896B000378871

For PUTTAPARTHI JAGANNATHAM & Co.,  
COMPANY SECRETARIES



CS NAVAJYOTH PUTTAPARTHI  
PARTNER, CP No. 16041