



KMP & ASSOCIATES
Company Secretaries

Address: Office 7/8, J. Harnam, Plaza,
Beside Om Optical, Opp. IDBI Bank,
Osmnapura, Aurangabad - 431005

LL: (0240)6604490
e-mail: office@kmpa.co.in
web: www.kmpa.co.in

Annex-A

Secretarial compliance report of Morganite Crucible (India) Limited

For the year ended 31st March 2020

I, Mandar Ganesh Takalkar Partner of KMP & Associates Company secretaries have examined the documents online due to COVID 19 Pandemic:

- (a) all the documents and records made available to us online and explanation provided by Morganite Crucible (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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under 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) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable)**
- (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)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable)**





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(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable)**

(g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable)**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **(Not Applicable)** 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:-

Sr.No.	Compliance Requirement (Regulations/circulars/guidelines/including specific clause)	Deviations	Observation /Remarks of the practicing company secretary
1.	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 Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under:

Sr.No.	Action Taken by	Details of violation	Details of action taken	Observations remarks of PCS
1.	NIL	NIL	NIL	NIL





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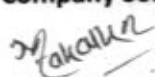
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr.No.	Observations of the practicing company secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March 2019	Action Taken by listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	NIL	NIL	NIL	NIL

Place: Aurangabad
Signature:
Date: 27/06/2020

FOR KMP & Associates
Company Secretaries


Mandar Takalkar
Partner
F9710
COP11947
UDIN Number F009710B000389311

