



**KMP & ASSOCIATES**  
Company Secretaries

**Address: Office 718, J. Harnam, Plaza,  
Beside Om Optical, Opp. IDBI Bank,  
Osmnapura, Aurangabad - 431005**

**LL: (0240)6604490  
e-mail: [office@kmpa.co.in](mailto:office@kmpa.co.in)  
web: [www.kmpa.co.in](http://www.kmpa.co.in)**

#### Annex-A

### Secretarial compliance report of Morganite Crucible (India) Limited

For the year ended 31<sup>st</sup> 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 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 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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(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 <sup>st</sup> 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*  
**Mandar Takalkar**  
Partner

**F9710  
COP11947  
UDIN Number F009710B000389311**

