



(Formerly P G INDUSTRY LIMITED)

To,
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai – 400001

30.05.2022

**SUB: DISCLOSURE DOCUMENTS UNDER REGULATION 24A OF SEBI
(LODR) REGULATIONS, 2015**

(Name of the Company – **Marble City India Limited**)
(Script Code: **531281**)

Dear Madam/Sir,

Kindly find the attached documents of Disclosures:

1. Annual Secretarial Compliance Report under Regulation 24A (2) of SEBI (LODR) Regulations, 2015 for the Financial Year ending on 31st March 2022.

Please acknowledge the same.

Your Sincerely ,

F

Sd/-

Copy to:

To,

The Calcutta Stock Exchange Limited

7, Lyons Range

Kolkata – 700001

Scrp Code: 026166



**ANNUAL SECRETARIAL COMPLIANCE REPORT
OF
MARBLE CITY INDIA LIMITED
(Formerly known as P G INDUSTRY LIMITED)**

(For the year ended 31st March, 2022)

I, Rajni Miglani Proprietor of R Miglani & Company, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to me and explanation provided by **MARBLE CITY INDIA LIMITED** (Formerly known as P G INDUSTRY 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, 2022 ("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) Regulation, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable for 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 for the period under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable for the period under review**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable for 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 for the period under review**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;
- (j) The provisions of the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993

-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	Pursuant to Regulation 33(3)(d) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015, The listed entity is required to submit annual audited standalone financial results for the financial year, within sixty days from the end of the financial year along with the audit report	The Company has submitted the Audited results for the financial year ended 31 st March, 2021 after stipulated period of 60 days and Extended deadline of June 30, 2021 as granted by SEBI vide CircularNo.SEBI/HO/CFD/CMD 1/P/CIR/2021/556	Due to unforeseen circumstances and delay in audit process, the Audited results for the financial year ended 31 st March, 2021 were submitted on 19 th August, 2021 i.e. after expiry of prescribed time period as given in the said regulation. However, the Company through its vide Request letter dated June 30, 2021 has sought extension of six



			weeks for the completion of Audit, approval & declaration of Financial Results ended 31 st March, 2021.
2	Pursuant to Regulation 33(3)(a) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015, The listed entity is required to submit quarterly and year-to-date standalone financial results to the stock exchange within 45 days of end of each quarter, other than the last quarter along with Limited Review Report.	The Company has submitted the Un-audited quarterly results for the quarter ended 30 th June, 2021 after stipulated period of 45 days.	Due to unforeseen circumstances the Audited results for the financial year ended 31 st March, 2021 were submitted on 19 th August, 2021 i.e. after expiry of prescribed time period as given in the said regulation.
3	Pursuant to Regulation 23(9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015, The listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis, in the format specified in the relevant accounting standards for annual results to the stock exchanges and publish the same on its website.	The company has made the said related party disclosure after expiry of prescribed time of 30 days from the date of publication of its standalone and consolidated financial results for the half year ended 30th September 2021.	The company was unable to comply with Regulation 23(9) within prescribed time of 30 days though it has submitted the same after expiry of 30 days.
4	Pursuant to Clause A(4)(h) of Schedule III Part A, Disclosures of Events or Information Specified Securities of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)	The Company has failed to submit outcome of board meeting within time period as specified in the Clause A(4)(h) of Schedule III Part A, Disclosures of Events or Information Specified Securities of Securities and	The Board meeting of the company approved financial result was held on 13 th August, 2021 commenced at 3:30 PM and concluded at 11:40 PM however the Company has submitted the out of the meeting on 14 th

	Regulation, 2015 The listed entity shall disclose to the Exchange(s), within 30 minutes of the closure of the meeting.	Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015.	August, 2021 11:14 AM i.e. after expiry of time period given in the said regulation.
5	Pursuant to Regulation 31(1)(b) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015, The listed entity is required to submit to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities on a quarterly basis, within twenty one days from the end of each quarter.	The company has failed to submit shareholding pattern within time as prescribed in Regulation 31(1)(b) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015 for the quarter ended 31 st December, 2021.	The company has submitted shareholding pattern for the for the quarter ended 31 st December, 2021 on 2 nd day of March, 2022 i.e. after expiry of time period given in the said regulation.
6	Pursuant to Regulation 47(3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015, The listed entity is required to publish within 48 hours of conclusion of the meeting of board of directors at which the financial results were approved.	The has failed to comply with the provision of Regulation 47(3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015 for the quarter ended September, 2021.	The Board meeting of the company approved financial result was held on 14 th November, 2021 commenced at 03.30 PM and concluded at 10.45 PM however the Company has published the financials on 17 th November, 2021 i.e. after expiry of time period given in the said regulation.
7	Pursuant to Regulation 31(4) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, The promoters of every target company are required to declare on a yearly basis that they, along with persons acting in concert, has not made any encumbrance, directly or indirectly, other than those already disclosed during the	The company has not made declaration as per the 31(4) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for the period under review.	Due to unforeseen circumstances the Company was unable to comply with the provisions of Regulation 31(4) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for period under review, however the management has taken action and complied the same for the ongoing financial year.

	financial year.		
--	-----------------	--	--

(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.
				None

(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.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Due to unforeseen circumstances the Audited results for the financial year ended 31 st March, 2020 were submitted on 14 th August, 2020, However the Company has obtained approval for waiver of the fine imposed for late/noncompliance from	31 st March, 2021	No effective action for the year ended 31 st March, 2021.	I have noted that the company has made several efforts to comply with the regulation however it has failed to take any effective action therefore has non complied with the regulation this year also.

	“Committee for Reviewing Representations for Waiver of Fines Levied under Standard Operating Procedure (SOP)”.			
2.	Due to unforeseen circumstances the Company was unable to comply with the provisions of Regulation 31(4) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	31 st March, 2021	No effective action 31 st March, 2021.	I have noted that though the company has not complied with provision for the 31 st March, 2021 however the company has taken action and complied the same for the ongoing financial year.

For R MIGLANI & CO.

Sd/-

Signature: 

Name of the Practicing Company Secretary: CS Rajni Miglani

ACS No.: 30016

C P No.: 11273

Place: New Delhi

Date: 19th May, 2022

UDIN:- A030016D000345595