

Polar Marmo Agglomerates Ltd.

CIN: L14102RJ1987PLC007839

Corporate Office Address: 701, Arunachal Building, 19, Barakhamba road, Connaught Place, New Delhi-110001

Phone: +91-11-43571042-45 Fax: 91-11-43571047

Email: polarmarmo@gmail.com, Website: www.pmagg.com

Dated: 24/07/2020

To,

**The Manager (Listing),
Calcutta Stock Exchange Limited,
7, Lyons Range,
Kolkata, West Bengal – 700001**

Subject : Submission of Annual Secretarial Compliance Report duly signed by the Practicing Company Secretary for the year ended 31st March, 2020.

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith “Annual Secretarial Compliance Report” for the year ended 31st March, 2020 duly signed by Kundan Agrawal & Associates, Practicing Company Secretary for your kind perusal.

We hope that you will find the above in order.

This is for your information and records please.

Thanking You.

Yours Truly,

For Polar Marmo Agglomerates Limited


Shatrughan Sahu
Director
DIN: 00343726



Encl : As Above

C.C. :

**The Manager (Listing),
The Delhi Stock Exchange Ltd.,
DSE House, 3/1, Asaf Ali Road,
New Delhi – 110002**

**The Manager (Listing),
Jaipur Stock Exchange Limited
Stock Exchange Building,**

Polar Marmo Agglomerates Ltd.

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**J.L.N Marg, Malviya Nagar,
Jaipur-302015**

Regd. Office & Works: Plot No. SP 1-3, Industrial Area, Pratap Nagar, Udaipur-313001, India



Secretarial Compliance Report of Polar Marmo Agglomerates Limited
for the year ended 31st March, 2020

We, Kundan Agrawal & Associates, Company Secretaries, having FRN: S2009DE113700 and office at 193 First floor, Shakti Khand 3(near One mall) Indirapuram, Ghaziabad U.P. India 201014 and have examined:

- (a) all the documents and records made available to us and explanation provided by “**POLAR MARMO AGGLOMERATES LIMITED**”(“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stockexchanges,
- (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 (Issue of Capital and Disclosure Requirements) Regulations,2018;
- (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 circulars/ guidelines issued thereunder;

And based on the above examination, we hereby report that, during the review period

- (a) The entity is listed on Calcutta Stock Exchange(CSE), Delhi Stock exchange (DSE), and Jaipur Stock Exchange (JSE). However, the trading of the shares of the Company are suspended from CSE. The scrip is not being traded at CSE since 1997. Further, SEBI vide its order dated November 19, 2014 has withdrawn the recognition of DSE and recognition of JSE has also been withdrawn by SEBI. Hence both DSE and JSE are non functional Exchanges as on date.
- (b) 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 31(2) & (3) of SEBI (LODR) Regulations, 2015	The shares of the Company are in Physical Form. The Company has not yet obtained demat connectivity	As per the explanation provided to us by the management of the Company, the Company is in the process of getting its shares dematerialized. The network of the company was totally eroded and the Hon'ble Board of Industrial Financial Reconstruction (BIFR) vide its Order dated 18/09/1998 has also declared the Company as a Sick Industrial Company in terms of Section 3(1)(o) of SICA. Hence, due to paucity of funds, the company could not obtain the demat connectivity from any of the depositories. However, in order to ensure the suitable compliance of SEBI (LODR) Regulations, 2015, at present, the company





Kundan Agrawal & Associates

Company Secretaries

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			is trying to arrange necessary funds for obtaining the demat connectivity.
2	Regulation 6 of SEBI (LODR) Regulations, 2015	Non Appointment of Company Secretary	As per the explanations provided to us by the management of the Company, Ms. Amanpreet Kaur was the Company Secretary of the Company and she resigned w.e.f. 10th August, 2019. Since then, the Company is in the process of finding a suitable candidate to fill the vacancy arised due to the resignation of Ms. Amanpreet Kaur and shall fill the same soon.

(c) 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.

(d) 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 issuedthereunder:

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.
1.	NIL	NIL	NIL	NIL

(e) 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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	NIL	NIL	NIL	NIL

For Kundan Agrawal & Associates
Company Secretaries

Place: Ghaziabad

Date: 23/07/2020



Kundan Agrawal
Company Secretary
Membership No. 7631
C.P. No. 8325
UDIN: F007631B000496317