



# THE GROB TEA CO. LTD.

30<sup>th</sup> June, 2021

To,  
The Secretary  
National Stock Exchange Of  
India Limited  
Exchange Palza Bandra Kurla  
Complex Mumbai - 400051

To,  
The Secretary  
The Calcutta Stock Exchange  
Limited  
7 Lyons Range,  
Kolkata - 700 001

Dear Sir,

Sub : Submission of Annual Secretarial Compliance Report for the year ended  
31<sup>st</sup> March, 2021

In compliance with Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements 2015; read along with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by CS MR & Associates (Practicing Company Secretary) for the financial year 2020 - 2021.

Please take the same in record and acknowledge.

Yours Faithfully,

For The Grob Tea Co. Ltd.

*Kritika Mowata*

(Company Secretary)

Encl : As Above

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"Haute Street", 9th Floor, 86A, Topsia Road (S), Kolkata - 700 046  
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Website : www.grobtea.com  
CIN : L74110WB1895PLC000963

*MR & Associates*  
Company Secretaries  
46, B. B. Ganguly Street, Kolkata-700012

SECRETARIAL COMPLIANCE REPORT  
OF  
THE GROB TEA COMPANY LIMITED

FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2021

[Pursuant to Circular No. CIR/CFD/CMD 1/27/2019 dated 08/02/2019 issued by  
Securities and Exchange Board of India]

To,  
The Members,  
THE GROB TEA COMPANY LIMITED  
"HAUTE STREET" 9<sup>th</sup> Floor,  
86A Topsia Road,  
Kolkata- 700046

We have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. **THE GROB TEA COMPANY 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 on 31st March, 2021("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");



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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; - **Not Applicable for the review period**
- (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 review period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - **Not Applicable for the review period**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not Applicable for the review period**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; -**Not Applicable for the review period**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- (i) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018

Based on the above examination, and considering the various relaxations granted, from time to time, by the Securities and Exchange Board of India and the Ministry of Corporate Affairs, in view of spread of COVID-19 pandemic, 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, 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 34 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Delay in submission of Annual Report	There was a delay in submission of Annual Report to Stock Exchange due to COVID-2019.

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- (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/our examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries(if any) 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.
1.	NSE vide letter NSE/LIST- SOP/ REG- 34/ FINES/ 0814 Dated 08.01.2021	Notice for non-compliance with Regulation 34 of SEBI (LODR) Regulations, 2015	Fine imposed of Rs. 7080/-	Due to delay in submission of Annual Report a fine is imposed by NSE and the Company has applied for waiver.

- (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 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	N/A	N/A	N/A	N/A

Place : Kolkata  
Date : 29.06.2021

For M R & Associates  
Company Secretaries



Tanvee  
Partner

C P No.: 13573

UDIN :A034974C000535342

Note: In view of the situation emerging out of the outbreak of COVID-19 Pandemic, physical documents, records & other papers of the Company for the quarter ended March 31st, 2021 required by us for our examination were obtained from the Company through electronic Mode and verified to the extent possible.