COMPANY SECRETARIES

B-15, "B" BLOCK, LAJPAT NAGAR-I NEW DELHI-110024, MOB. NO. +91.97174.900.58, +91.93137.82.760

The Board of Directors, Marvel Vinyls Limited G-73, Connaught Circus, New Delhi – 110 001.

CERTIFICATION UNDER CLAUSE 47(C) OF THE LISTING AGREEMENT

We have examined Memorandum of Transfer Registers, files and other documents of M/s Marvel Vinyls Limited having its registered office at G-73, Connaught Circus, New Delhi – 110 001 maintained by M/s Beetal Financial & Computer Services (P.) Ltd. pertaining to transfer of equity shares of the Company for the period from 01/10/2010 to 31/03/2011 for the purpose of issuing of certificate as per Clause 47(C) of the Listing Agreement with Bombay Stock Exchange(BSE) / other Stock Exchanges where equity shares of the Company are listed and on the basis of information provided by the Company, hereby certify that the Company has not required to deliver any share certificate relating to share transfer, exchange of duplicate and split of certificates, as no request was received during half year ended on 31st March, 2011 for the same.

For Aman Jain & Associates

Company Secretares

Aman Kumar Jain (Proprietor)

C.P. No. 8452

New Delhi

The 18th of April, 2011