

22nd June, 2021

To,
The Manager,
Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400 001.

Security ID: MODULEX

Scrip Code: 504273

Sub: Submission of Annual Secretarial Compliance Report for the year ended 31st March, 2021.

Dear Sir/Madam

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015, Please find enclosed herewith the Annual Secretarial Compliance Report from Practicing Company Secretary for the year ended 31st March, 2021.

You are requested to take note of the above. Please acknowledge the receipt.

Thanking you,

Yours faithfully,

For Modulex Construction Technologies Limited



Bhoomi Mewada
Company Secretary and Compliance Officer



Encl: A/a

GUPTA BAUL & ASSOCIATES

COMPANY SECRETARIES

Secretarial Compliance Report of Modulex Construction Technologies Limited (CIN: L45100PN1973PLC182679) for the financial year ended as on 31st March, 2021

I, Hitesh J. Gupta, Partner of Gupta Baul & Associates, Company Secretaries have examined:

- a) all the documents and record made available to us and explanation provided by Modulex Construction Technologies Limited (hereinafter referred 'the Company'),
- b) the filings/submissions made by the Company to the stock exchanges,
- c) website of the Company,
- d) any other documents/filing, as may relevant, which has been relied upon to make this certificate,

for the financial year ended as on 31st March, 2021 ("Review Period") in respect of compliance with 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 Contract (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circular, 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 - **Not Applicable during 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 as the Company has not bought back/proposed to buy-back any of its securities during the financial year ended 31st March, 2021 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 as the Company has not issued or listed any Debt Securities during the financial year ended as on 31st March, 2021 under review;**

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- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 – **Not Applicable as the Company has not issued or listed any Non-Convertible and Redeemable Preference Shares during the financial year ended as on 31st March, 2021 under review;**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And circular/guidelines issued thereunder.

Based on the above examination, we hereby report that during the Review Period:

- a) The Company has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder.
- b) The Company has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from our examination of those records.
- c) The following are the details of actions taken against the Company/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 – **NIL**.
- d) The Company has taken the following actions to comply with the observations made in previous report – **Not Applicable**.

For Gupta Baul & Associates

Company Secretaries



Hitesh J. Gupta

Place: Mumbai

Date: 18/06/2021

Hitesh J. Gupta

Partner

ACS No.: A33684

C P No.: 12722

UDIN: A033684C000484301