

MEPIDL/OUT/2020-21/192  
July 30, 2020

To,

<b>Listing Department</b> <b>National Stock Exchange of India Limited</b> Exchange Plaza, C-1 Block G, Bandra Kurla Complex, Bandra (E), Mumbai -400 051 Fax No. 022-26598120/38 <b>Scrip Symbol: MEP</b>	<b>Corporate Relationship Department</b> <b>BSE Limited</b> Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001 Fax No. 022-22723121/3027/2039/2061 <b>Security Code: 539126</b>
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Dear Sir/ Madam,

**Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2020**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time and SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, Please find enclosed herewith the Annual Secretarial Compliance Report furnished by Mr. Dinesh Joshi, Partner, KANJ & Co. LLP, Practicing Company Secretaries, (C.P. No. 2246) for the financial year ended March 31, 2020.

This is for your information and record.

Thanking You.

Yours faithfully,

For **MEP INFRASTRUCTURE DEVELOPERS LIMITED**



**HARSHAD PUSALKAR**  
**COMPANY SECRETARY**  
**M: FCS10576**  
**Mobile: 8879752294**

Encl.: As above

**SECRETARIAL COMPLIANCE REPORT OF  
MEP INFRASTRUCTURE DEVELOPERS LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH 2020**

I, CS Dinesh Joshi, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us and explanation provided by **MEP INFRASTRUCTURE DEVELOPERS LIMITED** (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) other documents and information received from the MCA portal and stock exchange websites,

for the year ended 31<sup>st</sup> 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: There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

  
*Dinesh Joshi*

- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013: There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder.

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

The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder including SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October 2019 on changes in terms of appointment of statutory auditors, the Company has amended the terms of appointment of statutory auditor to give effect to the said circular, except in the matter specified viz:-

Compliance Requirement (Regulations/ circulars / guidelines including specific clause):-

Clause 4(1) of Minimum Standards for Code of Conduct for Listed Companies to Regulate, Monitor and Report Trading by Designated Persons of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015. Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.

Deviations:-

During the period 20 Equity Shares valuing Rs. 776 (Rupees Seven Hundred and Seventy Six Only) were disposed off on 22<sup>nd</sup> January 2020 by Mr. Jayant Mhaiskar, Managing Director of the Company during the Trading Window closure period from 1<sup>st</sup> January 2020 till 16<sup>th</sup> February 2020.

Observations/ Remarks of the Practicing Company Secretary

In this regard, it was informed that Mr. Jayant Mhaiskar was maintaining a Demat and Trading account with Reliance Securities Limited. As per communication between both, it appears that the said shares were wrongly sold off by Reliance Securities Limited for the recovery of outstanding balance of Rs. 745/- (Rupees Seven Hundred and Forty Five Only). This fact has been intimated to the Stock Exchanges by Mr. Jayant Mhaiskar as well by the Company

- (a) 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.
- (b) No actions had been 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.

As there were no observations made in the previous reports, the listed entity was not required to carry out 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
NOT APPLICABLE				

For KANJ & CO. LLP  
COMPANY SECRETARIES

  
DINESH JOSHI  
DESIGNATED PARTNER  
M. NO.: F3752  
CP. NO.: 2246  
UDIN:F003752B000402513



DATE:30<sup>th</sup> June, 2020  
PLACE: Pune