



Modipon Limited

Hapur Road, Modinagar, Ghaziabad -201 204 (UP)

Phone (01232) 243471

To,

28th May 2022

The BSE Ltd.
Corporate Relation Department,
New Trading Ring, Rotunda Building,
P.J. Tower, Dalal Street, Fort, Mumbai-400001

Ref: INE 170C01019

Scrip Code: 503776

Sub: Secretarial Compliance Report under Regulation 24 A of SEBI (LODR), Regulation, 2015

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, please find enclosed a Secretarial Compliance Report from a Company Secretary in Practice dated 28th May, 2022 for the year ended 31st March, 2022.

Please take the above on record.

Thanking you

Yours sincerely,

For MODIPON LIMITED

Vineet Kumar Thareja
(Company Secretary and Compliance Officer)

Enclosed-As mentioned

SECRETARIAL COMPLAINT REPORT OF MODIPON LIMITED
FOR THE YEAR ENDED MARCH 31, 2022

To,
The Board of Directors
Modipon Limited
Hapur Road,
Modinagar-201204

We M/s Ranjeet Verma & Associates have examined:-

- (a) All the documents and records made available to us and explanation provided by Modipon Limited ("the listed entity"),
- (b) The filings/submissions made by the listed entity to the stock exchange,
- (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 March 31, 2022 ("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 Regulation, 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share based Employee Benefits) Regulations, 2014;
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

(g) Securities and Exchange Board of India (Issue and listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) The Depositories Act, 1996 and the regulation and Byes Laws framed thereunder to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, to the extent applicable;

(j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and Dealing with client and to the extent of securities issued;

Note: Since the company is not under operation, hence most of the acts which would be specifically applicable on this sector are not applicable in this situation.

And based on the above examination, 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:-

S. No.	Compliance Requirement (Regulation/Circulars/Guidelines including specific clause)	Deviations	Observation/Remarks of the practicing company secretary
NIL			

(b) The Listed entity 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 action 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:

S. No.	Action taken by	Details of Violation	Details of action taken E.g. fines, warning letter, debarment	Observations/remarks of the Practicing Company Secretary, if any.
NIL				

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	Observation of the Practicing Company Secretary in the previous year reports	Observations made in the secretarial compliance report for the year ended 2020-21	Action taken by listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Pursuant to Regulation 23(9) of Listing Regulations, the disclosure of related	Pursuant to Regulation 23(9) of Listing Regulations,	The Company Secretary has sent the adequate	BSE Limited vide its email dated 20.07.2021 has informed that the

<p>party transactions was required to be submitted to the stock exchange by December 13, 2020, however, the same was submitted on January 29, 2021. The Company had received a notice from BSE Limited w.r.t non-compliance and imposing a fine for the said non-compliance of Rs. 1,75,000/-. The Company had sent adequate response to the BSE Limited in this regard.</p>	<p>the disclosure of related party transactions was required to be submitted to the stock exchange by December 13, 2020, however, the same was submitted on January 29, 2021.</p>	<p>response to the BSE Limited in this regard for a review of penalty and request for waiver of penalty for non-compliance as company was awaiting for the reply of the BSE on the Regulation 23 (9) compliance of Listing regulation.</p>	<p>company representation for waiver was placed before the Committee for reviewing representation for waiver of Fines levied under SOP. Pursuant to the decision of the aforesaid Committee, we hereby inform you that the company request for waiver of the fine has been approved</p>
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**For RANJEET VERMA & ASSOCIATES
COMPANY SECRETARIES**



**CS RANJEET KUMAR VERMA
PROPRIETOR
M.NO- F6814
CP NO- 7463
UDIN:- F006814D000413913**

Place: NOIDA
Date: 28/05/2022