



Modern Insulators Limited

Registered Office : Talheti, Village : Karoli, Tehsil : Abu Road
District : Sirohi - 307510 (Rajasthan) India
Phone: 02974-228044 to 228047, Fax : 02974-228043
www.moderninsulators.com CIN- L31300RJ1982PLC002460
Email : compliance@moderninsulators.com

Date: - 29/06/2021

To
BSE Limited
Dalal Street
Phiroze Jeejeebhoy Towers,
Fort, Mumbai - 400 001

Scrip Code: 515008

Dear Sirs,

Sub: Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2021

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 enclosed herewith the Annual Secretarial Compliance Report of the Company dated 28th June, 2021, for the financial year ended 31st March, 2021 issued by Jyoti Soni & Associates, Practicing Company Secretaries.

This is for your information and records.

Thanking You

For Modern Insulators Limited

Gaurav
Gaurav Goyal
Company Secretary
& Compliance Officer





JYOTI SONI & ASSOCIATES
Practicing Company Secretary

P.NO. 3, Keshav Marg, Shivaji Chowk,
Brahampuri, Jaipur- 302002 Rajasthan
Email: jyotisoni1804@gmail.com
Contact No.: 91+ 9799440636

SECRETARIAL COMPLIANCE REPORT
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To
The Board of Directors
Modern Insulators Limited
Talheti, Village Karoli,
Tehsil Abu Road
Dist. Sirohi- 307510 (Rajasthan)
CIN: L31300RJ1982PLC002460

We M/s. Jyoti Soni & Associates, Company Secretaries have examined:

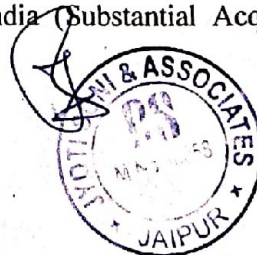
- the documents and records made available to us and explanation provided by **Modern Insulators Limited** ("the Listed Entity"),
- the filings/ submissions made by the Listed Entity to the stock exchanges,
- website of the Listed Entity,
- any other documents/ filing, as may be relevant, which has been relied upon to make this certification,

for the Financial Year ended 31st March, 2021 ("*Review Period*") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("*SEBI Act*") and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not applicable during the review period**
- 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 during the review period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not applicable during the review period**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable during the review period**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not applicable during the review period**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (j) The provisions of Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **Not applicable during the review period**

and circulars/ guidelines issued thereunder;

Based on our examination and verification of the documents and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the 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.	SEBI (Prohibition of Insider Trading) Regulations, 2015: Under Regulation 7(2) (a)	Trishul Traders Pvt. Ltd. (promoter) had gifted 251684 shares to Vijay Beneficiary Trust (Promoter) on 09/10/2020 for which intimation given to the Company on 15/01/2021.	Promoters of the Company has not complied with the provision of regulation 7(2) a of SEBI (Prohibition of Insider Trading) Regulations, 2015 being delay in disclosure of the inter-se transaction between the promoters dated 09/10/2020 to the Company
2.	SEBI (Prohibition of Insider Trading) Regulations, 2015: Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.	Ajaymeru Trading & Investments Pvt. Ltd. (promoter) had purchased 50000 shares on 28/01/2021 from open market during the closure of trading window.	Ajaymeru Trading & Investments Pvt. Ltd. (promoter) has violated the Company's Code of Conduct for prevention of Insider Trading.

- (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 our examination of those records.
- (c) The following are the details of actions 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:



Sr. No.	Action Taken by	Details of violation	Details of action taken e.g. fines, warning letters, debarment, etc.	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:

Sr. No.	Observations/ remarks of the Practicing Company Secretary, if any.	Observation made in the Secretarial Compliance Report for the year ended 31.03.2020	Action Taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Listed Entity
1.	SEBI (Listing Obligations & Disclosure Requirements) Regulation, 2015	During the period under review the Company has complied with the provisions of the SEBI (Listing Obligations & Disclosure Requirements) Regulation, 2015 except delay in filing for some instances.	During the year under review, the company has taken due care in avoiding delay in filing/ disclosure and there we no delay in filing/disclosure.	The comments given by the company are self-explanatory and does not require any further comments.

For Jyoti Soni & Associates
Company Secretaries
ICSI Unique Code S2018RJ606900

Place: Jaipur
Date: 28/06/2021



Jyoti
(CS Jyoti Soni)

ACS 38058|CP No.19478
UDIN: A038058C000533047