



# Modern Threads (India) Limited

Registered Office :

Unit : Modern Woollens

Hamirgarh Road, Pragati Path, Near Transport Nagar,

Bhilwara-311001 (Rajasthan) India

Tel : 91-1482-241801, Fax : 297924, Email : cs@modernwoollens.com

Website : www.modernwoollens.com CIN : L17115RJ1980PLC002075

To,

Date : May 27, 2022

The Manager,  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400 023  
Scrip Code: 500282

The Manager,  
National Stock Exchange of India Ltd.  
Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex,  
Bandra East, Mumbai-400 051  
Scrip Code: MODTHREAD

Sub.: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022

Ref: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/Madam

With reference to SEBI Circular CIR/CFD/CMDI/27/2019 dated 8<sup>th</sup> February, 2019, we are enclosing herewith Annual Secretarial Compliance Report dated 26/05/2022 of the Company for the financial year ended 31<sup>st</sup> March, 2022 issued by R.K. Jain & Associates, Practicing Company Secretaries, Bhilwara.

This is for your information and records.

Thanking You,

Yours faithfully,  
FOR Modern Threads (India) Limited

*B.L. Saini*



(BANWARI LAL SAINI)  
Company Secretary and Compliance Officer

Marketing Office : 5, Bhima Building, Sir Pochkhanwala Road, Worli, Mumbai-400030

Plants : 

Woolens Division	: Hamirgarh Road, Pragati Path, Near Transport Nagar, Bhilwara-311001 (Rajasthan)
Yarn Division	: Village Raila, District - Bhilwara-311024 (Rajasthan)

**SECRETARIAL COMPLIANCE REPORT**  
OF  
**MODERN THREADS (INDIA) LIMITED**  
For the year ended 31<sup>st</sup> March, 2022

We, R K Jain & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Modern Threads (India) Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (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 31<sup>st</sup> March, 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 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; (**Not applicable to the Company during the Review Period.**)
- (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 to the Company during the Review Period.**)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (**Not applicable to the Company during the Review Period.**)





- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable to the Company 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 to the Company 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;  
and circulars/ guidelines issued thereunder;

and based on the above examination 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.	Regulation 33(3) of SEBI (LODR) Regulations, 2015 regarding Submission of Quarterly Financial Results, Limited Review Report to Stock Exchanges	Delay in submission of Quarterly Financial Results to Stock Exchange: ➤ Q2-Sept, 21 of 2021-22 approved in BM held on 19.11.2021, submitted on both stock exchanges on 19.11.2021.	The Financial Results were not submitted to Stock Exchange within specified time as per SEBI (LODR) Regulations.
2.	Regulation 34(1) of SEBI (LODR) Regulations, 2015 regarding Submission of Annual Report for 31.03.2021.	AGM held on 30.09.2021. Delay in submission of Annual Report in PDF Format submitted at BSE on 27.09.2021 and at NSE on 28.09.2021	Required to be submitted on the date of dispatch to the Shareholders. According to BSE Circular LIST/COMP/40/2 018-19 dated 08.02.2019 Filing of Annual Reports in XBRL mode in addition to pdf mode

3.	Regulation 23(9) of SEBI (LODR) Regulations, 2015 regarding disclosure of related party transactions on consolidated basis.	Delay in submission of related party transactions at both stock exchanges on consolidation basis for the Half year ended 30.09.2021	The Disclosure of Related party transactions were not submitted within specified time to Stock Exchange for the Half year ended 30.09.2021.
4.	Regulation 30 (8) of SEBI (LODR) Regulations, 2015 regarding disclosures of all events and information which has been disclosed to stock exchange shall be hosted on the website for a minimum 5 period of five years	Requirement of Regulation 30(8) not complied by the company	As information provided that the company is in process of revocation of suspension of trading of its securities and submitting its documents to Stock Exchanges

(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 my/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 letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
- None -				

The listed entity has taken the following 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 31/03/2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	NA	Non-Submission with disclosure of related party transactions at both stock exchanges on consolidation basis for the Half year ended 1)31.03.2020 2)30.09.2020	The Company has submitted the disclosure of related party transaction for the Half-year ended 30.09.2020 to Both Stock Exchanges.	
2	NA	Requirement of Regulation 30(8) not complied by the company regarding disclosures of all events and information which has been disclosed to stock exchange shall be hosted on the website for a minimum 5 period of five years	The Company is in process to Update the Records on the Website.	

For R K Jain & Associates  
Company Secretaries

  
  
**CS R.K. Jain**  
 Proprietor

Membership No.FCS - 4584  
 COP No.:5866  
 UDIN:F004584D000394688

Place: Bhilwara  
 Date:26.05.2022