



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 : June 29, 2021

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 31st March, 2021

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 8th February, 2019, we are enclosing herewith Annual Secretarial Compliance Report dated 29/06/2021 of the Company for the financial year ended 31st March, 2021 issued by R.K. Jain & Associates, Practicing Company Secretaries.

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 : **Woollens 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 31st March, 2021

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 31st March, 2021 ("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.**)

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Company Secretaries

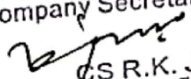
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COP.No. 5866

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations,2014; **(Not applicable to the Company during the Review Period.)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations,2008;**(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 (Depositories and Participants) Regulations, 2018;
- 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 the spread of the COVID-19 pandemic, we hereby report that, during the Review Period:

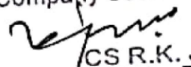
- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -

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	<p>Delay in submission of Quarterly Financial Results to Stock Exchange:</p> <p>➤ Q4- March,20 of 2019-20 approved in Board Meeting (BM) held on 28.10.2020 submitted at BSE on 28.10.2020 and submitted on 29.10.2020 at NSE.</p> <p>➤ Q1- June,20 of 2020-21 approved in BM held on 28.01.2021 submitted at BSE on 28.01.2021 and submitted on 29.01.2021 at NSE.</p>	<p>The Financial Results were not submitted to Stock Exchange within specified time as per SEBI (LODR) Regulations.</p> <p>The Management represented that the Company is in the process of revocation of suspension of trading of its securities and submitting its documents to</p>

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		<ul style="list-style-type: none"> ➤ Q2-Sept, 20 of 2020-21 approved in BM held on 26.02.2021, submitted on both stock exchanges on 26.02.2021. ➤ Q3 - Dec. 20 of 2020-21 approved in BM held on 30.03.2021 submitted at BSE on 30.03.2021 and submitted on 31.03.2021 at NSE 	Stock Exchanges.
2.	Regulation 34(1) of SEBI (LODR) Regulations, 2015 regarding Submission of Annual Report for 31.03.2020.	<p>AGM held on 28.12.2020. Delay in submission of Annual Report to BSE and NSE in XBRL on 10.03.2021.</p> <p>Annual Report in PDF Format submitted on 15.12.2020 at BSE and NSE.</p>	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.	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 Disclosure regarding related party were not submitted to Stock Exchange for the Half year ended 31.03.2020 and 30.09.2020 within specified time as per SEBI (LODR) Regulations.
4.	Regulation 30(1) and 30(2) under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 regarding Continual Disclosure.	Delay in submission of Continual Disclosure at both Stock exchanges.	Required to be submitted within 7 days from the end of financial year, according to SEBI Circular SEBI/HO/CFD/D CR1/CIR/P/2020/ 49 Dated 27,2020 extend the date to 01.06.2020.

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5.	Regulation 30 of SEBI (LODR) Regulations, 2015, regarding disclosures of events or information	Delay in submission regarding following Disclosures at both the Stock Exchanges: 1. Shifting of Registered Office of Company. 2. Re-appointment of Shri Ram Rai Kabra as Independent Director.	As information provided that the Company is in the process of revocation of suspension of trading of its securities and submitting its documents to Stock Exchanges
6.	Regulation 47 of SEBI (LODR) Regulations, 2015 regarding Advertisement in Newspapers.	Requirements of Regulation 47 not complied with by the company, as the same could not disclosed on website of the company as per Reg. 46(1)(q).	As information provided that the company is in the process of revocation of suspension of trading of its securities and submitting its documents to Stock Exchanges
7.	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
8.	Regulation 14 of Listing Fees & Other Charges	Non-Payment of BSE listing fees and other charges for the financial year 2020-2021.	Required to be paid within one month from the end of financial year. As information provided that the company is in process of Paying the listing Fees for the Financial Year 2020-2021.

- (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

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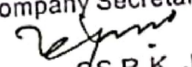
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various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

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 31/03/2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	NA	Requirement of Advertisement in Newspapers as per Regulation 47 of SEBI (LODR) Regulations, 2015 has not been complied with. As such, the same could not be disseminate on website of the company	No action initiated by the company.	
2.	NA	Regulation 40(9) of SEBI (LODR), 2015 regarding PCS certificate for issue of Share Certificates in time Non-submission of the Certificate of RTA within 30 days for the half year ended on 31.03.2019	No action initiated by the company.	

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3	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.	
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For R K Jain & Associates
Company Secretaries



CS R.K. Jain
Proprietor

Membership No. FCS - 4584

COP No.: 5866

UDIN: F004584C000536445

Place: Bhilwara
Date: 29.06.2021