



MOLD-TEK
Packaging Limited
(Formerly known as Moldtek Plastics Ltd.)

30th July, 2020

To, The Manager, Department of Corporate Services, Bombay Stock Exchange Ltd., P.J. Towers, Dalal Street, Mumbai-400001 Scrip Code: 533080	To, The General Manager, National Stock Exchange India Ltd., Exchange Plaza, Bandra Kurla Complex, Bandra East, Mumbai-400051 Ref: MOLDTKPAC
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Dear Sir,

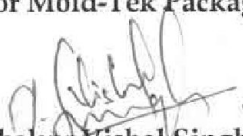
Sub: Submission of Annual Secretarial Compliance Report of the Company for the financial year ended 31st March, 2020.

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular (CIR/CFD/CMD1/27/2019) dated February 8, 2019 please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended on 31st March, 2020 issued by Mr. Ashish Kumar Gaggar, Practicing Company Secretary.

This is for your information and records.

Thanking you.

For Mold-Tek Packaging Limited


Thakur Vishal Singh
(Company Secretary)



Corporate Office :

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Website : www.moldtekgroup.com CIN No: L21022TG1997PLC026542

Secretarial Compliance Report of "MOLD-TEK PACKAGING LIMITED"

For the year ended 31st March 2020

I, **Ashish Kumar Gaggar** have examined:

- all the documents and records made available to me and explanation provided by **MOLD-TEK PACKAGING LIMITED**("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March 2020 ("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 there under 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 to the listed entity during the review period*
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: - *Not Applicable to the listed entity during the review period*
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - *Not Applicable to the listed entity during the review period*
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - *Not Applicable to the listed entity during the review period*
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

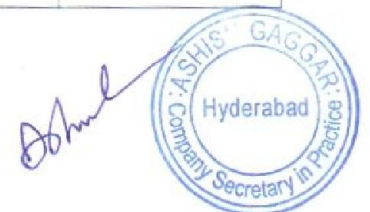
and based on the above examination, I hereby report that, during the Review Period:

- (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:-

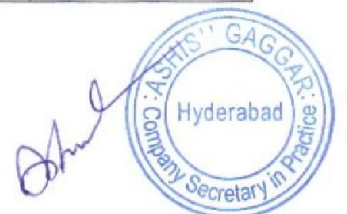
Sr. No	Compliance Requirement Deviations Observations/ (Regulations/ circulars / Remarks of the guidelines including specific Practicing clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	As per Regulation 17(1) (b) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, where the chairperson of the board of directors is a non-executive director, at least one-third of the board of directors shall comprise of independent directors and where the listed entity does not have a regular non-executive chairperson, at least half of the board of directors shall comprise of independent directors"	<i>The company was not in compliance with the requirements pertaining to the composition of the board as per the Regulation 17(1) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, from November 24, 2019 to January 26, 2020</i>	The Company has complied with the requirement of said regulation by appointing two more Non-Executive Independent Directors on the Board, in the Board meeting held on January 27, 2020.

- (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 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.	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
1	BSE Limited	The company was in non-compliance with the requirements pertaining to the composition of the board as per the Regulation 17(1) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2018 for 38 days (November 24, 2019 to December 31, 2019)	BSE Limited vide its letter LIST/COMP/Reg,27(2) & Reg. 17 to 21/Dec-19/533080/283/2019-20 dated February 03, 2020 imposed the fine of Rs 2,24,200/-. (Basic Fine - 1,90,000/- and GST @ 18%- 34,200/-)	NIL


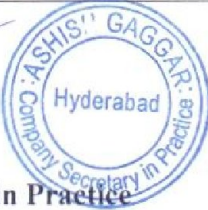


2	National Stock Exchange of India Limited	The company was in non-compliance with the requirements pertaining to the composition of the board as per the Regulation 17(1) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2018 for 38 days (November 24, 2019 to December 31, 2019)	National Stock Exchange of India Limited vide its letter NSE/LIST-SOP/CG/FINES/100977 dated February 03, 2020 imposed the fine of Rs 2,24,200/-. (Basic Fine - 1,90,000/- and GST @ 18%- 34,200/-)	NIL
3	BSE Limited	The company was in non-compliance with the requirements pertaining to the composition of the board as per the Regulation 17(1) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2018 for 26 Days (January 01, 2020 to January 26, 2020)	BSE Limited vide its email dated July 08, 2020 imposed the fine of Rs 1,53,400/-. (Basic Fine - 1,30,000/- and GST @ 18%- 23,400/-)	The Company has filed a letter dated 09 th July 2020 in which the company has requested for waiver of penalty and personal hearing representation. Reply is awaited from the BSE Limited.
4	National Stock Exchange of India Limited	The company was in non-compliance with the requirements pertaining to the composition of the board as per the Regulation 17(1) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2018 for 26 Days (January 01, 2020 to January 26, 2020)	National Stock Exchange of India Limited vide its letter NSE/LIST-SOP/CG/FINES/0468 dated July 02, 2020 imposed the fine of Rs 1,53,400/-. (Basic Fine - 1,30,000/- and GST @ 18%- 23,400/-)	The Company has filed a letter dated 07 th July 2020 in which the company has requested for waiver of penalty and personal hearing representation. Relevant hearing was held on 20 th July 2020. Reply is awaited from the National Stock Exchange of India Limited.



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

Sr.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Ashish Gaggar
Company Secretary in Practice
FCS : 6687
CP No: 7321

Date: 30th July 2020
Place: Hyderabad
UDIN : F006687B000526910