



Modipon Limited

CIN: L65993UP1965PLC003082

Regd. Office: Hapur Road, Modinagar, Ghaziabad -201 204 (UP)

Phone: (01232) 243471

30th July, 2019

To
The BSE Limited
The Listing Department
25th Floor, Phiroze Jeejeebhoy Tower,
Dalal Street, Mumbai-400 001

SUB: Annual Secretarial Compliance Report for the year ended March 31, 2020

Ref: - Scrip Code: 503776

Dear Sir/ Ma'm,

In Compliance with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended March 31, 2020.

We request you to please take the above on record.

Thanking you

Yours faithfully,

For MODIPON LIMITED

Vineet Kumar Thareja
Company Secretary & Compliance Officer

Encl: As above

**SECRETARIAL COMPLIANCE REPORT OF MODIPON LIMITED
FOR THE YEAR ENDED MARCH 31, 2020**

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, 2020 ("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;
- (k) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

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 my 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	Observations/remarks of the Practicing Company Secretary, if any.
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			letter, debarment	
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 2018-19	Action taken by listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable during the year under review				

**For RANJEET VERMA & ASSOCIATES
COMPANY SECRETARIES**



CS RANJEET KUMAR VERMA
PROPRIETOR
M.NO- F6814
CP NO- 7463

Place: NOIDA
Date: 29/07/2020