



Modern Threads (India) Limited

Registered Office :

A-4, Vijay Path, Tilak Nagar, Jaipur-302 004

Phone : 0141-4113645, Fax : 0141-2621382

E-mail : cs@modernwoollens.com
modernjaipuroffice@gmail.com

Website : www.modernwoollens.com

CIN : L17115RJ1980PLC002075

To,

Date : 31st July 2020

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, 2020

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 30/07/2020 of the Company for the financial year ended 31st March, 2020 issued by R.K. Jain & Associates, Practicing Company Secretaries.

Kindly take the same on record.

Thanking You,

Yours faithfully,
FOR Modern Threads (India) Limited

(BANWARI LAL SAINI)
Company Secretary and Compliance Officer



Corporate Head Office : 68/69, Godavari, Pochkhanwala, Worli, Mumbai-400030
Tel.:022-24973269, Fax : 022-24950962

Plants - [Woolens Division : Hamirgarh Road, Bhilwara-311001 (Rajasthan)
Tel.:01482-241801, Fax : 01482-297924
Yarn Division : Village Raila, District - Bhilwara-311024 (Rajasthan)]

SECRETARIAL COMPLIANCE REPORT
OF
MODERN THREADS (INDIA) LIMITED
for the year ended 31st March, 2020

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, 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 there under 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 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 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;

and circulars/ guidelines issued thereunder;

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:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 29 of SEBI (LODR) Regulations, 2015 regarding Prior Intimation of the Board Meeting	Prior Intimation of Board Meeting for considering Financial Results for quarter ended 31/12/2018 were not given to Stock Exchange.	The Company is in the process of revocation of suspension of trading of its securities and submitting its documents to Stock Exchanges.
2.	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: <ul style="list-style-type: none"> ➤ Q4 March,19 of 2018-19 approved in Board Meeting (BM) on 30.05.2020 submitted on 05.06.2019 ➤ Q1- June,19 of 2019-20 approved in BM on 07.01.2020 submitted on 07.01.2020 ➤ Q2 - Sept.19 of 2019-20 approved in BM on 28.05.2020 submitted on 	The Financial Results were not submitted to Stock Exchange within specified time as per SEBI (LODR) Regulations. The Management represented that the Company is in the process of revocation of suspension of trading of its securities and submitting its documents to Stock Exchanges.

		28.05.2020 ➤ Q3 - Dec. 19 of 2019-20 approved in BM on 06.07.2020 submitted on 06.07.2020	
3.	Regulation 34(1) of SEBI (LODR) Regulations, 2015 regarding Submission of Annual Report for 31.03.2019	AGM held on 28.09.2019. Annual Report submitted to BSE in XBRL on 30.10.2019. Annual Report in PDF Format submitted to BSE on 18.01.2020 and to NSE on 28.01.2020.	Required to be submitted on the date of dispatch to the Shareholders, i.e. 21 clear days before the date of AGM. 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
4.	Regulation 46(2)(l) of SEBI (LODR) Regulations, 2015 regarding disclosures on website of the company	Notice of Meeting of Board of Directors for Financial Results not available on Website of the company for the quarter ended 31.12.2018.	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
5.	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.	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



		FY 2018-19 as required by Regulation 29 of SEBI (LODR) Regulations, 2015.		
2	NA	Notice of the Meeting of Board of Directors for Financial Results were not disseminate on the website of the Company as required by Regulation 46(2)(l) of SEBI (LODR) Regulations 2015.	Still not disseminated on the Website of the Company.	NA.
3	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 could be initiated by the company.	

For R K Jain & Associates
Company Secretaries



CS R.K.Jain
Proprietor

Membership No.FCS - 4584

COP No.: 5866

UDIN: F004584B000530153

Place: Bhilwara
Date: 30.07.2020