

31 July, 2020

The Manager
(Department of Corporate Services)
BSE Limited
P. J. Towers, Dalal Street, Fort,
Mumbai - 400 001

Through BSE Listing Centre
Scrip Code: 519003

Dear Sir / Madam,

Sub: Annual Secretarial Compliance Report for the Financial Year 2019-20

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 and SEBI/HO/CFD/CMD1/CIR/P/2020/109 dated June 25, 2020, please find enclosed the Annual Secretarial Compliance Report of the Company issued by Mr. Deepak Bansal of Deepak Bansal & Associates, Practicing Company Secretaries for the financial year 2019-20.

This is for your kind information and records please.

Thanking you !

Yours Faithfully,
For **MODI NATURALS LIMITED**



Ankit Agarwal
Company Secretary
Memb. No. – ACS 23445

Encl : A/a

DEEPAK BANSAL & ASSOCIATES

Company Secretaries

Fiat No.1601, 16th Floor, Tower M, Arihant Arden, Plot No.GH-07A,
Sector 01, Greater Noida, Gautam Buddha Nagar, Uttar Pradesh-201306
Ph.: 98991 67774; Email: csdeepakbansal@gmail.com

Secretarial Compliance Report of Modi Naturals Limited For the Financial Year Ended 31st March, 2020

We, Deepak Bansal & Associates, Practicing Company Secretaries have examined:

- a) all the documents and records made available to us and explanation provided by **Modi Naturals 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 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
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



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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
	None		

- 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 our examination of those records on sample basis.

- 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
	None	None	None	None

- d) 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 end (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
	None	N.A	N.A	N.A



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Note:

- 1) Provide the list of all the observations in the report for the previous year along with the actions taken by the Listed Entity on those observations : **Not Applicable**
- 2) Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised / observations: **Not Applicable**

**For DEEPAK BANSAL & ASSOCIATES
Company Secretaries**



Date: July 29, 2020
Place: New Delhi

Handwritten signature

**Deepak Bansal
Prop.**

FCS No.: 3736
CP No.: 7433

UDIN: F003736B000526126