

MANUFACTURER OF ELECTRICAL CONTACTS FOR LOW, MEDIUM & HIGH VOLTAGE SWITCHGEAR INDUSTRY

**MODISON ®
METALS LIMITED**

33 -NARIMAN BHAVAN. 227 - NARIMAN POINT
MUMBAI - 400 021. INDIA
TEL : +91-22-2202 6437 FAX: +91-22-2204 5009
EMAIL : sales@modison.com WEB :www.modison.com
CIN NO: L51900MH1983PL0029783

22nd June, 2020

Department of Corporate Services
BSE Limited
P. J. Towers,
Dalal Street,
Mumbai-400001

Dear Sir

Security Code: 506261

Sub: Annual Secretarial Compliance Report for the period ended 31st March, 2020

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015, as amended, we enclose herewith the Annual Secretarial Compliance Report issued by Ragini Choksi & Co, for the year ended 31st March, 2020 for your information and record.

Kindly take the same on record.

Thanking you,

Yours faithfully,

For Modison Metals Limited



Manika Arora
Company Secretary & Compliance Officer

WORKS: 85/A, B,D & E. 'E' ROAD, PHASE 1, GIDC, VAPI. DIST. VALSAD, GUJARAT-396195. INDIA TEL.+91-260-243 1093, FAX: +91-260-240 0209



Tel 022-2283 1120
022-2283 1134

Ragini Chokshi & Co.
Company Secretaries

34, Kamer Building, 5th Floor, 38 Cawasji Patel Street, Fort, Mumbai- 400 001

E-mail: ragini.c@rediffmail.com/mail@csraginichokshi.com

Web: csraginichokshi.com

Secretarial Compliance Report

of **MODISON METALS LIMITED** for the year ended March 31, 2020

[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We have examined:

- (a) all the documents and records made available to us and explanation provided by **MODISON METALS 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 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 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 Audit 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 Audit Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Audit Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit 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 Audit Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018 **(To the extent applicable)**

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.	As per Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015 the listed entity shall submit to the stock exchange, where the securities of such entity are listed a Secretarial Compliance Report within 60 days of the end of financial year	15 days	Secretarial Compliance Report for the financial year 2018-19 is to be submitted on or before 31.05.2019 the same is submitted on 15.06.2019



2.	As per Regulation 34(1)(a) of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015 The listed entity shall submit to the stock exchange and publish on its website a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders;	6 days	The Annual Report was dispatched to shareholders on 09.07.2019, while the same was submitted to BSE on 15.07.2019
3.	As per Regulation 40(9) of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015 the listed entity shall ensure that the share transfer agent and/or the in-house share transfer facility, as the case may be, produces a certificate from a practicing company secretary within one month of the end of each half of the financial year, certifying that all certificates have been issued within thirty days of the date of lodgement for transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/allotment monies.	15 days	The Certificate under this regulation is to be submitted on or before 31.10.2019, the same is submitted on 15.11.2019
4.	As per regulation 44(3) of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015 the listed entity shall submit to the stock exchange, within forty eight hours of conclusion of its General Meeting, details regarding the voting results in the format specified by the Board.	1 day	Voting results of Annual General Meeting held on 06.08.2019, are submitted on 09.08.2019 due to technical issues

(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 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 actions taken E.g. fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary
Not Applicable during the year under review				

- (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 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 during the year under review				

Date: 22/06/2020
Place: Mumbai



FOR RAGINI CHOKSHI & CO

MAKARAND PATWARDHAN
(PARTNER)
CP No: 9031
ACS: 11872
UDIN: A011872B000366468