

DEEPAK BANSAL & ASSOCIATES

Company Secretaries

Flat 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, 2022

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 CIN :L15142DL1974PLC007349 (“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, 2022** (“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)

Contd...2

- 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 and Participants) Regulations, 1996;
- j) Securities and Exchange Board of India (Registrars to an issue and Share Transfer Agents) Regulations 1993;
- k) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (Not applicable to the company during the Audit Period)

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			

- 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

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
(Firm No.S2007DE093100)

Deepak Bansal
Prop.

Date: May 30, 2022
Place: Greater Noida

FCS No.: 3736; CP 7433
UDIN: F003736D000433407
Peer Review Certificate No.900/2020