

3rd September, 2022

To,
The Manager
Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort, Mumbai - 400 001.

Security ID: MODULEX

Scrip Code: 504273

Sub: Submission of Annual Secretarial Compliance Report for the year ended 31st March, 2022.

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015, Please find enclosed herewith the Annual Secretarial Compliance Report from Practicing Company Secretary for the year ended 31st March, 2022.

You are requested to take note of the above. Please acknowledge the receipt.

Thanking You,

Yours faithfully,

For Modulex Construction Technologies Limited



Bhoomi Mewada
Company Secretary and Compliance Officer



Encl: A/a



Secretarial Compliance Report of Modulex Construction Technologies Limited (CIN - L45100PN1973PLC182679) for the financial year ended as on 31st March, 2022

I, Hitesh J. Gupta, Practicing Company Secretaries have examined:

- a) all the documents and record made available to us and explanation provided by Modulex Construction Technologies Limited (hereinafter referred 'the Company'),
- b) the filings/submissions made by the Company to the stock exchanges,
- c) website of the Company,
- d) any other documents/filing, as may be relevant, which has been relied upon to make this certificate,

for the financial year ended as on 31st March, 2022 ("Review Period") in respect of compliance with 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 Contract (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circular, 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 period under review;**
- 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 as the Company has not bought back/proposed to buy-back any of its securities during the financial year ended 31st March, 2022 under review;**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - **Not Applicable during the period under review**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not Applicable as the Company has not issued or listed any Debt Securities during the financial year ended as on 31st March, 2022 under review;**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013 – **Not Applicable as the Company has not issued or listed any Non-Convertible and Redeemable Preference Shares during the financial year ended as on 31st March, 2022 under review;**



CS HITESH J. GUPTA B.COM, ACS

PRACTICING COMPANY SECRETARY

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h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And circular/guidelines issued thereunder.

Based on the above examination, I hereby report that during the Review Period:

a) The Company has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of matters specified below:

- There has been a delay in submission of the Audited Financial Results under Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for quarter and year ended 31st March, 2022.

- Nomination and Remuneration Committee meeting and Stakeholders Relationship Committee meeting have not been held during the year as per the requirements of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

-The Company had received a whistle blower complaint during the period under review, further the Company had appointed Ms. Sneha Kuruvila for investigating the complaint and as per the report received, the allegations were unjustifiable and the Company has been asked to take appropriate action as per the Whistle Blower Policy.

b) The Company has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from my examination of those records.

c) The following are the details of actions taken against the Company/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 – **NIL**.

d) The Company has taken the following actions to comply with the observations made in previous report – **Not Applicable**.

Hitesh J. Gupta
Practicing Company Secretary
M No. A33684
CP No.12722
UDIN: A033684D000897063
Date: September 02, 2022
Place: Mumbai