



**ANNUAL SECRETARIAL COMPLIANCE REPORT
OF
MMP INDUSTRIES LIMITED
FOR THE FINANCIAL YEAR 2020-2021 ENDED 31 MARCH 2021**

[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) read with SEBI Circular bearing No. CIR/CFD/CMD1/27/2019 Dated 8 February 2019]

MMP Industries Limited
CIN : L32300MH1973PLC030813
Registered Office: 211, Shri Mohini,
345, Kingsway, Nagpur 440001, MH, IN

We, M/s Vaibhav Jachak & Co, Company Secretaries, Nagpur, [ICSI Membership No. FCS – 8821, Certificate of Practice No. 18495], having its Office at T1, 369B, Aditi Apartment, Tiranga Square, Nagpur 440009, MH, IN, have examined:-

(a) all the documents and records made available to us and explanation provided by MMP Industries Limited, [Corporate Identification Number (CIN) – L32300MH1973 PLC030813], having its Registered Office at 211, Shri Mohini, 345, Kingsway, Nagpur - 440001, MH, IN (“**the listed entity**”),

(b) the filings / submissions made by the listed entity to the stock exchange/s,

(c) website of the listed entity, and

(d) any other document / filing, as may be relevant, which has been relied upon to make this report, for the financial year 2020-2021 ended 31 March 2021 (“**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 (Buyback of Securities) Regulations, 2018 – Not Applicable to the Listed Entity for the Review Period;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 – Not Applicable to the Listed Entity for the Review Period;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 – Not Applicable to the Listed Entity for the Review Period;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 – Not Applicable to the Listed Entity for the Review Period;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Any other regulations as applicable –
 - i. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
 - ii. Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;

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
Not Applicable			





(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued thereunder insofar as it appears from 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 action taken e.g. fines, warning letter, debarment, etc.	Observations / remarks of the Practicing Company Secretary, if any.
Not Applicable				

d) The listed entity has taken the following actions to comply with the observations made in previous reports:-

Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable			

Note:- The Government of India is satisfied that the country is threatened with the spread of COVID-19 epidemic which has already been declared as a Pandemic by the WHO, and has considered it necessary to take effective measures to prevent its spread across the country and that there is a need for consistency in the application and implementation of various measures and accordingly, has issued necessary directions for strict implementation of lockdown across the country.

Accordingly, the issue of this Annual Secretarial Compliance Report, is subject to the relaxation/s granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India and also, the limitation for verification of physical record/s of the Company, which were obtained through electronic mode.

Signed and Issued on this Wednesday, the 23rd day of June 2021 at Nagpur

For M/s VAIBHAV JACHAK & CO.
Company Secretaries

CS Vaibhav Yashwant Jachak
Proprietor
Company Secretary in Practice
M No. FCS -8821, CoP No. 18495
(UDIN): F008821C000504811 Dated 23rd June 2021.

Note - The Annual Secretarial Compliance Report is to be read with our letter of even date which is annexed as an Annex A and forms an integral part of this Report.





Annex A to the Annual Secretarial Compliance Report

MMP Industries Limited
C I N : L 32300 MH 1973 PLC 030813
Registered Office: 211, Shri Mohini,
345, Kingsway, Nagpur 440001, MH, IN

We, M/s Vaibhav Jachak & Co, Company Secretaries, Nagpur, [ICSI Membership No. FCS – 8821, Certificate of Practice No. 18495], having its Office at T1, 369B, Aditi Apartment, Tiranga Square, Nagpur 440009, MH, IN, have conducted the Annual Secretarial Compliance Audit for the purpose of issuing Annual Secretarial Compliance Report of MMP Industries Limited, [Corporate Identification Number (CIN) L32300MH1973PLC030813], having its Registered Office at 211, Shri Mohini, 345, Kingsway, Nagpur - 440001, MH, IN (“the listed entity”) for the financial year 2020-2021 ended 31 March 2021 (“Review Period”) as to the compliance of applicable statutory provisions and the adherence to good corporate practices by the Listed Entity. Annual Secretarial Compliance Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts or statutory compliances and expressing our opinion thereon.

The Annual Secretarial Compliance Report is based on our verification of the Company’s books, papers, minute books, forms and returns filed and other records maintained by the Company, review of management representation letter along with quarterly compliance report/s by respective Department Head/s, Company Secretary, Chief Financial Officer, Managing Director, noted and taken on record by the Board of Directors of the Company at their meeting/s, and also the information and explanation provided by the Company, its officers, agents and authorised representatives, during the conduct of Annual Secretarial Compliance Audit for the Review Period.

As such, our Annual Secretarial Compliance Report of even date is to be read along with this letter:-

1. Management's Responsibility

(a) It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all applicable laws and regulations and to ensure that the systems are adequate and operate effectively.

(b) The compliance of the provisions of other applicable laws, rules, regulations, standards is the responsibility of management of the Company.

2. Auditor's Responsibility

(a) Our responsibility is to express an opinion on these records, standards and procedures followed by the Company with respect to compliances.





(b) We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the records. We believe, the processes and practices that we followed provide a reasonable basis for our opinion. We also believe that audit evidence and information obtained from the Company's management is adequate and appropriate for us to provide a basis for our opinion.

(c) We have not verified the correctness and appropriateness of financial records and books of accounts of the Company.

(d) Wherever required, we have obtained the management's representation about the compliance of laws, rules and regulations and happening of events, etc.

3. Disclaimer

The Annual Secretarial Compliance Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Signed and Issued on this Wednesday, the 23rd day of June 2021 at Nagpur.

For M/s VAIBHAV JACHAK & CO.
Company Secretaries

CS Vaibhav Yashwant Jachak
Proprietor
Company Secretary in Practice
M No. FCS -8821, CoP No. 18495

(UDIN): F008821C000504811 Dated 23rd June 2021.

