

# MOHINDRA FASTENERS LIMITED



CIN: L74899DL1995PLC064215

Regd. Office: 304 Gupta Arcade, Inder Enclave, Delhi - Rohtak Road, New Delhi-110087

Website: [www.mohindra.asia](http://www.mohindra.asia) Email id: [cs@mohindra.asia](mailto:cs@mohindra.asia) Phone: +91-11- 46200400, 46200401 Fax: +91-11-46200444

To,

The Head Listing & Compliance  
Metropolitan Stock Exchange of India Ltd. (MSEI)  
Building A, Unit 205A, 2nd Floor,  
Piramal Agastya Corporate Park,  
L.B.S Road, Kurla West, Mumbai - 400 070

Ref: - Symbol- MFL, Series - BE

Subject: Submission of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022

Ref.: Regulation 24A of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019.

Dear Sir/Madam,

With respect to the captioned subject & reference, please find enclosed herewith the Annual Secretarial Compliance Report of the Company issued by M/s. Anand Nimesh & Associates, Practicing Company Secretaries, New Delhi dated May 24, 2022, for the financial year ended 31<sup>st</sup> March, 2022.

Kindly take the same on your records.

Thanking you,

Yours Faithfully,  
For Mohindra Fasteners Limited

  
(Nidhi Pathak)  
Company Secretary & Compliance Officer



Date: 24/05/2022

Place: New Delhi

# Anand Nimesh & Associates

(Company Secretaries)

183B, Gali No-8, Second Floor, Gurudwara Road  
West Guru Angad Nagar, Laxmi Nagar, Delhi-110092  
Tel: 011-45769228, M: 9868782243, 8810200014  
E-mail: vdnext1711@gmail.com, ancorporate2@gmail.com

## SECRETARIAL COMPLIANCE REPORT OF MOHINDRA FASTENERS LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH 2022

To,  
The Board of Directors  
MOHINDRA FASTENERS LIMITED  
(CIN- L74899DL1995PLC064215)  
304 Gupta Arcade, Inder Enclave  
Delhi-Rohtak Road, New Delhi-110087

We, M/s Anand Nimesh & Associates, Practicing Company Secretaries have examined:

- the documents and records made available to us and explanation provided by Mohindra Fasteners Limited ("the Company"),
- the filings/ submissions made by the Company to the stock exchange,
- website of the Company, and
- any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31<sup>st</sup> March, 2022 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- 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, as were relevant and applicable to the Company during the year under review, have been examined, include:

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;



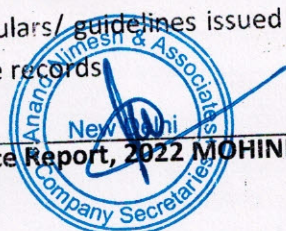
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the 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 and Participants) Regulations, 2018
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and
- (k) circulars/ guidelines issued thereunder;

Based on my examination and verification of the documents and records produced to us and according to the information and explanations given to us by the Company, we report that during the Review Period;

- (a) Company 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.		NIL	

- (b) The Company 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 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:

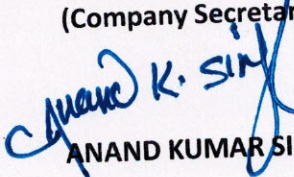
Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
NIL				

(d) The Company 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 company, if any	Comments of the Practicing Company Secretary on the actions taken by the company
1.	NIL		NA	NA

Note: During this challenging time of COVID 19 outbreak this report has been undertaken to the best of my capability based on of e verification of scans, soft copies, information, confirmations, records and documents made available to us by the management along with physical verification of records of the company shown to us during the audit.

For Anand Nimesh & Associates  
(Company Secretaries)

  
ANAND KUMAR SINGH  
(Partner)

M. No- F10812

COP No- 9404

UDIN- F010812D000375651

Date: 24/05/2022

Place: Delhi



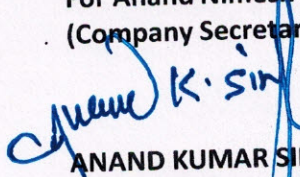
This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.

To,  
 The Board of Directors  
**MOHINDRA FASTENERS LIMITED**  
 (CIN- L74899DL1995PLC064215)

The Secretarial Compliance Report of even date is to be read along with this letter.

- 1) Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made thereunder and Regulations, circulars and guidelines issued thereunder by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.
- 2) We have followed the audit practices and processes including procedures prescribed for and during COVID-19 period by The ICSI and as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done electronically to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.
- 3) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity.
- 4) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
- 5) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.
- 6) The Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Anand Nimesh & Associates  
 (Company Secretaries)

  
 ANAND KUMAR SINGH  
 (Partner)

M. No- F10812

COP No- 9404

UDIN- F010812D000375651

Date: 24/05/2022

Place: Delhi

