

NC MEDI-CAPS LIMITED

Regd. Office and works:

Mhow - Neemuch Road, Sector 1, CIN: L70100MP1983PLC002231
Pithampur - 454775, Dist. Dhar
Madhya Pradesh, India

Ph:- +91-7292- 424242

Fax:- 07292- 407387

E mail:- investors@medicaps.com

Web site:- www.medicaps.com

MCL/SE/2020-2021

Date: 19/06/2020

Online filing at: www.listing.bseindia.com

To,
The General Manager
DCS-CRD
BSE Ltd.
Rotunda Building,
P.J. Tower, Dalal Street, Fort
MUMBAI - 400001

BSE Code: 523144

Sub: Submission of the Annual Secretarial Compliance Report for the year ended 31.03.20


Dear Sir,

With reference to the terms of clause 3(b)(iii) of the SEBI Circular No. CIR/CFD/CMD1/127/2019 dated 8th February, 2019, we hereby submit the Annual Secretarial Compliance Report for the year ended 31.03.2020.

You are requested to please take on record the above said document for your reference & further needful.

Thanking you,
Yours faithfully,

For, MEDI-CAPS LTD.


AYUSHI SILOT
COMPANY SECRETARY &
COMPLIANCE OFFICER



Encl- a/a



SECRETARIAL COMPLIANCE REPORT

(Pursuant to Regulation 24A of the SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/1/27/2019 dated 8th February, 2019)

OF MEDI-CAPS LIMITED for the year ended 31.03.2020

- I, **CS Ishan Jain**, proprietor of M/s Ishan Jain & Co., Company Secretaries have examined:
- all the documents and records made available to us and explanation provided by **Medi-Caps Limited** (CIN: L70100MP1983PLC002231) ("the Listed Entity")
 - the filings/ submissions made by the listed entity to the BSE Ltd., - www.bseindia.com
 - website of the Medi-Caps Limited. www.medicaps.com.
 - any other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **31st March, 2020** ("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 thereunder; 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, have been examined, include: -

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 (*Not applicable*)
- SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- SEBI (Buyback of Securities) Regulations 2018 (*Not applicable*)
- SEBI (Share Based Employee Benefits) Regulations, 2014; (*Not applicable*)
- SEBI (Issue and Listing of Debt Securities) Regulations, 2008; (*Not applicable*)
- SEBI (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (*Not applicable*)
- SEBI (Prohibition of Insider Trading) Regulations, 2015;
- circulars/guidelines issued thereunder;

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

- The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder as applicable to it during the review period, 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	Para 4 of Schedule B of SEBI (PIT) Regulations, 2015 related to trading of shares by promoter while Trading Window is closed	Acquisition of some shares of Promoter when Trading Window is closed.	Mrs. Kusum Mittal, a Director and Promoter of the company has acquired 200 equity shares of Rs. 10/- each on 12/07/2019 when the trading window of the company was closed.



			However, The Compliance Officer has issued a show cause notice to impose penalty.
2	As per Regulation 5 of SEBI (Prohibition of Insider Trading) Regulations, 2015 the promoter who intends to acquire/dispose shares of the company are required to submit Trading Plan to the Compliance Officer of the company.	Non submitted Trading Plan as required under Regulation 5.	Mrs. Kusum Mittal, a Director and promoter has acquired 4,584 equity shares of Rs. 10/- each during the year 2019-20 without complying with the Regulation 5 of SEBI (PIT) Regulations, 2015 relating to submission of the Trading Plans and matters related thereto.

- (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 my 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.
=====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 ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
=====N.A.=====				

Place: Indore
Date : 10th June, 2020
UDIN: F009978B000332168



FOR, ISHAN JAIN & CO.,
COMPANY SECRETARIES

ISHAN JAIN
FCS No.: 9978
C.P. No.: 13032