

**BLAK & CO.**  
**Company Secretaries**

**SECRETARIAL COMPLIANCE REPORT**

for the financial year ended 31<sup>st</sup> March, 2020

(Pursuant to SEBI- CIR/CFD/CMD/1/27/2019 Dated February 08, 2019)

To,

The Members,

**SHREE KRISHNA PAPER MILLS & INDUSTRIES LTD.**

4830/24, Prahlad Street, Ansari Road,

Darya Ganj, New Delhi-110002

We have conducted the Secretarial Compliance Audit of applicable statutory provisions and the adherence to good corporate practices by **SHREE KRISHNA PAPER MILLS & INDUSTRIES LTD.** Secretarial Compliance Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

We have examined:

- (a) all the documents and records made available to us and explanation provided by the Shree Krishna Paper Mills & Industries Limited ("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 31<sup>st</sup> March 2020 ("Review period") in respect of compliance with the provision of applicable following laws:
  - (i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
  - (ii) 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)**

**GLOBIZ**

towards corporate excellence

H.O.: 3FCS - 08 ( 3RD FLOOR ), ANSAL PLAZA,  
VAISHALI, DELHI NCR - 201010 (INDIA)

B.O.: 307 (3RD FLOOR), 79 - SHYAM LAL ROAD  
DARYA GANJ, NEW DELHI - 110002 (INDIA)

TEL: +91-9990573703

E-mail: globizassociates@gmail.com



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- 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 & Participants) Regulation, 1996 and 2018;
- j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- k) 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,
- (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) There was no 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.
- (d) The Secretarial Compliance Report for the financial year ending 31.03.2019 did not contain any observation hence there was no need to take action by the Listed Company.

Place: New Delhi  
Date: 29/06/2020

for **BLAK & CO.**  
Company Secretaries



**Archana Bansal)**

Mg. Partner

M.No. – A17865

COP No.- 11714

UDIN-A017865B000396331