

BLAK & CO.
Company Secretaries

SECRETARIAL COMPLIANCE REPORT

for the financial year ended 31st March, 2021

(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 31st March 2021 ("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) TM 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 & 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 *but the The Company has received an e-mail correspondence dated 15th February 2021 from Bombay Stock Exchange towards imposing of penalty for non-compliance of certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Standard Operating Procedure for suspension and revocation of trading of specified securities of listed entities with reference to SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020. The said penalty of Rs.542800/- is communicated to have been imposed under Regulation 17(1) for Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director.*

The Company has produced copy of replies sent through mail 20.02. 2021, 24.02.2021, 27.02.2021 and by Speed post-dated 24.02.2021 seeking waiver of penalties on the basis of claiming of compliance of above-mentioned regulation.



(d) The Secretarial Compliance Report for the financial year ending 31.03.2020 did not contain any observation hence there was no need to take action by the Listed Company.

Place: New Delhi

Date: 09/04/2021

for BLAK & CO.
Company Secretaries


(Archana Bansal)
Mg. Partner

M.No. – A17865

COP No.- 11714

UDIN- A017865C000030955