

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

**SECRETARIAL COMPLIANCE REPORT**

for the financial year ended 31<sup>st</sup> march 2022

(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** for the financial year ended 31<sup>st</sup> March 2022. 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 2022 ("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) <sup>TM</sup> Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



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- 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 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(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 or Stock Exchanges during the review period;
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports;





S.N O.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the previous years	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	An issue related to notice received from BSE on dated 15/02/2021 towards imposing penalty of Rs 542800/- for non-complying the provision of Regulation 17(1)(c) of SEBI (listing Obligations and Disclosure requirements) Regulations, 2015.	N.A	The company has submitted several replies through mails and speed post seeking waiver of penalties. The issue is still pending with the BSE.	Non-compliance was inadvertent and unintentional. The Company has applied waiver of fine under policy for exemption of fine levied as per the provisions of SEBI SOP circular. However final outcome of appropriate Authority is awaited.

**Place:** Ghaziabad, NCR  
**Date:** 05.05.2022

for **BLAK & CO.**  
Company Secretaries



**ARCHANA BANSAL**

Mg. Partner

M.No. - A17865

COP No.- 11714

**UDIN:-** A017865D000272196