

**Secretarial compliance report of SHREE RAMA NEWSPRINT LIMITED for the year ended
31st March, 2021**

I Ravi Kapoor has examined:

- all the documents and records made available to me and explanation provided by representative of **SHREE RAMA NEWSPRINT LIMITED** ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- 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 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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, except in respect of matters specified below:-

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Company Secretaries

Trade Mark Agent

Insolvency Resolution Professional

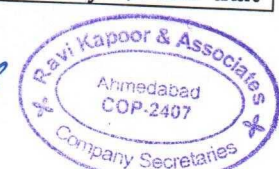
Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Gujarat Pollution Control Board ("GPCB") had issued order for closure of operations of paper division of the Company on June 25, 2020. The Company was required to make disclosure of the said order under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 within 24 hours from the date of receipt of said order.	The Company has made disclosure with the Stock Exchange on 8th August, 2020 upon actual closure of operations of paper division of the Company on account of closure order issued by GPCB dated June 25, 2020.	The Company was required to make disclosure with the Stock Exchange(s) within 24 hours from the receipt of order of GPCB dated June 25, 2020. However, Company has made disclosure with the Stock Exchange(s) on August 8, 2020 i.e. upon actual closure of operations of paper division of the Company and to that extent Company has not complied with the provisions of Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

(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/our 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.
1.	Securities and Exchange Board of India (SEBI) has issued warning letter to the Company for	The Company was required to make disclosure with the Stock Exchange(s) within 24 hours from the receipt of	Warning letter	Company has provided an assurance to both the Stock Exchanges vide its letter dated January 7, 2021 that

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Company Secretaries

Trade Mark Agent

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delay in disclosure for closure order for it's paper division of GPCB dated June 25, 2020.	order of GPCB dated June 25, 2020. However, Company has made disclosure with the Stock Exchange(s) on August 8, 2020 i.e. upon actual closure of operations of paper division of the Company and to that extent Company has not complied with the provisions of Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	in future Company will make all necessary disclosures as and when required under SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015
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(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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: Ahmedabad
Date: 26th June, 2021

For, Ravi Kapoor & Associates

Ravi Kapoor
Ravi Kapoor
Company Secretary in practice
FCS No. 2587
C P No.: 2407
UDIN: F002587C000521985

