

Yugandhara Kothalkar
Practicing Company Secretary
CA, CMA, U.C.S., M.B.A (Finance),
CMA (Final),

Plot No. R-138, Tajshree Sankul,
Reshimbag, Nagpur, (MH) – 440009.
Mob. No. – +91 97660 02821
E-mail - cs.yuga@gmail.com

**SECRETARIAL COMPLIANCE REPORT OF MALU PAPER MILLS LIMITED FOR
the year ended 31ST March, 2019.**

I have examined:

- (a) all the documents and records made available to me and explanation provided by MALU PAPER MILLS LIMITED (CIN – L15142MH1994PLC076009) (“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, 2019 (“Review Period”) in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- (b) 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;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2009;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



Yugandhara Kothalkar
Practicing Company Secretary
B. Com., LL.B, ACS, MBA (Finance),
CMA (Final),

Plot No. R-138, Tajshree Sankul,
Reshimbag, Nagpur, (MH) – 440009.
Mob. No. – +91 97660 02821
E-mail - cs.yuga@gmail.com

(i) Other regulations as applicable and circulars/ guidelines issued thereunder;
and based on the above examination, I 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, 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.	Regulation 6 – Appointment of Company Secretary as Compliance Officer	From 1 st April, 2018 to 30 th July, 2018	Appointment of Company Secretary as Compliance Officer w.e.f. 31 st July 2018

(b) The listed entity has maintained proper records under the provisions of the above Regulations and Circulars/ Guidelines issued thereunder in so far 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:
NOT APPLICABLE

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **NOT APPLICABLE**

Date : 20th May, 2019
Place : Nagpur


CS. Yugandhara Kothalkar
Practicing Company Secretary
ACS No.:28673, CP No.:10337