

*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](mailto:cs.yuga@gmail.com)

**Secretarial Compliance Report of MALU PAPER MILLS LIMITED for  
the year ended 31<sup>ST</sup> 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 31<sup>st</sup> 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, 2008;
- (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;



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(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 <sup>st</sup> April, 2018 to 30 <sup>th</sup> July, 2018	Appointment of Company Secretary as Compliance Officer w.e.f. 31 <sup>st</sup> 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 : 20<sup>th</sup> May, 2019  
Place : Nagpur

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