

Date: 30-05-2025

To
The Manager
Department of Corporate Services
The Bombay Stock Exchange Ltd.
Floor 25, PJ Towers,
Dalal Street,
Mumbai – 400 001.

To
The Manager
Department of Corporate Services
The National Stock Exchange of India
"Exchange Plaza"
Bandra Kurla Complex, Bandra (E)
Mumbai - 400 051.

Security Code: 532728

Symbol: MALUPAPER

Sub : Annual Secretarial Compliance Report for the year ended 31st March, 2025.

Ref : Regulation 24(A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Sir/Madam,

Pursuant to Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015, as amended, please find enclosed copy of Annual Secretarial Compliance Report dated 29-05-2025 issued by CS. Ramachandran Iyer, Practicing Company Secretary for the financial year 2024-25.

You are requested to take the above on record and oblige.

Thanking You,

Yours faithfully,

For Malu Paper Mills Limited

Mayuri

Suresh

Asawa

Mayuri Asawa

Company Secretary & Compliance officer

Mem. no: A50891

Encl: As above

Digitally signed by Mayuri Asawa
DN: cn=Mayuri Asawa, o=Malu Paper Mills Ltd.,
c=IN, email=mayuri.asawa@malupaper.com,
serial=123456789, version=3



RAMACHANDRAN IYER
Company Secretary

Flat No.104, First Floor,
"ARIHANT ARCADE", "A" Wing,
Karnewar Layout,
Near Hingna T Point
Nagpur – 440 036

Secretarial Compliance Report
of
MALU PAPER MILLS LIMITED
for the year ended 31st March, 2025.

To,

The Board of Directors of
MALU PAPER MILLS LIMITED
CIN :- L15142MH1994PLC076009
REGD. OFFICE :- HEERA PLAZA, 4THFLOOR,
NEAR TELEPHONE EXCHANGE, NAGPUR,
MH 440008, INDIA.

I **Ramachandran Iyer**, Company Secretary in practice have examined:

(a) all the documents and records made available to us and explanation provided by **MALU PAPER MILLS 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, 2025 ("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 there under; and
(b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 (Not applicable to the listed entity during the Review Period);
(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (Not applicable to the listed entity during the Review Period);



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the listed entity during the Review Period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (Not applicable to the listed entity during the Review Period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; (Not applicable to the company during the period under review)
- (k) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; (Not applicable to the company during the review period)

and circulars/ guidelines issued thereunder and based on the above examination, I/We hereby report that, during the Review Period:

- (a) MALU PAPER MILLS LIMITED 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)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount (Rs.)	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Financial Results of FY 2023-2024 to be filed within 30 days	23(9) of SEBI (LODR)	Filed with delay of 1 day	NSE & BSE	Penalty imposed for late filing	Late filing of Report by 1 day.	Rs.5900/- each by NSE & BSE	Penalty paid by the company.	Due to technical reason it could not be filed. Care should be taken to avoid penalty.	NIL

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sl No	Observations/ Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	Annual Report of FY 2022-2023 to be filed immediately as it is approved by Board	Annual Report of FY 2022-2023 Filed with delay of 23 days	34 of SEBI (LODR)	For late filing of Annual Report by 23 days SEs imposed Penalty of Rs.54280/- .	Penalty paid by the company	The Company paid Penalty of Rs.54280/-.

I. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr.No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/ guidelines issued by SEBI. 	Yes Yes	

3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">• The Listed entity is maintaining a functional website.• Timely dissemination of the documents/ information under as separate section on the website.• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website.	Yes	
4.	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement Sof material as well as other subsidiaries	NA	The Company do not have any subsidiary.
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/ during the financial year as prescribed in SEBI Regulations.	Yes	

8.	<p>Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.</p>	Yes	Refer point 8(a) above
9.	<p>Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed there under.</p>	Yes	
10.	<p>Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) &3(6) SEBI (Prohibition of Insider Trading) Regulations,2015.</p>	Yes	
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued there under except as provided under separate paragraph herein(**).</p>	Yes	During the year under review One action taken against the company by NSE & BSE for non compliance of Regulation of 23(9) of SEBI (LODR) Regulations, 2015 & Company has duly paid the penalty amounting to Rs. 5900/- each to NSE & BSE.(incl of Gst). Respectively.
12.	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied</p>	NA	

RAMACHANDRAN IYER
Company Secretary

Flat No.104, First Floor,
"ARIHANT ARCADE", "A" Wing,
Karnewar Layout,
Near Hingna T Point
Nagpur – 440 036

	with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.		
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc.	NA	

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Date: 29/05/2025
Place: Nagpur


Ramachandran Iyer
Practicing Company Secretary
M.No. FCS 5255
CP No.: 3773
UDIN: F005255G000481335
Peer Review No: 5661/2024

