





**PRIYANKA JAISWAL & ASSOCIATES**  
COMPANY SECRETARIES  
FLAT NO 402, 4TH FLOOR,  
'ASHIRWAD TOWERS',  
BAJAJ NAGAR, NAGPUR-440010  
Mob.: 9422101400  
Email id: jaiswalpriyanka990@gmail.com

**ANNUAL SECRETARIAL COMPLIANCE REPORT  
OF**

**MALU PAPER MILLS LIMITED**

FOR THE FINANCIAL YEAR ENDED MARCH 31, 2026.

[Pursuant to Regulation 24A(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

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

I Priyanka Jaiswal, Company Secretary in practice have examined:

- all the documents and records made available to us and explanation provided by MALU PAPER MILLS LIMITED ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended March 31, 2026 ("Review Period") in respect of compliance with the provisions of:

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 (Buyback of Securities) Regulations, 2018; [Not Applicable during the Review Period]
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; [Not Applicable during the Review Period]
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the listed entity during the Review Period);
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; [Not Applicable during the Review Period]
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;





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- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- k) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; [Not Applicable during the Review Period]

and circulars/ guidelines issued thereunder; and based on the above examination, I 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.	Deviation	Action Taken by	Type Of Action	Details Of Violation	Fine Amount	Observations/ Remarks of Practicing Company Secretary	Management Response	Remarks
NIL										

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

SI No	Observations Remarks of the Practicing Company Secretary in the previous Reports (PCS)	Observations Made in the previous Secretarial Compliance Report for the year ended 31.03.2025	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	Financial Results of FY 2023-2024 to be filed within 30 days	Late filing of report by 1 day	Reg 23(9) of SEBI (LODR) Reg, 2015	Filed with delay of 1 day	The Company paid the penalty of Rs. 5900/- each to	Penalty paid by the Company





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					both exchanges BSE & NSE respectively	
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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.	<b>Secretarial Standards:</b>  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.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/ guidelines issued by SEBI.</li></ul>	Yes  Yes	
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website.</li><li>Timely dissemination of the documents/information under as separate section on the website.</li><li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website.</li></ul>	Yes	The Company had uploaded the Annual Return as required under Section 92 of the Companies Act, 2013 pursuant to Regulation 46(2) of SEBI (LODR) Regulations, 2015. However, due to a technical/display issue, the same was not accessible/visible on the website during the review conducted by BSE Limited. Upon receipt of the





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			observation email from the Exchange, the Company rectified the issue and ensured proper accessibility of the disclosure on its website. No penalty or enforcement action has been initiated by the Exchange.
4.	<b>Disqualification of Director:</b>  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.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b>  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.	<b>Preservation of Documents:</b>  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.	<b>Performance Evaluation:</b>  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.	<b>Related Party Transactions:</b>  a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	During the Review Period, there were no such instances





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	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.	NA	
9.	<b>Disclosure of events or information:</b>  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.	Yes	
10.	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) &3(6) SEBI (Prohibition of Insider Trading) Regulations,2015.	Yes	
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any</b>  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 Regulation of there under except as provided under separate paragraph herein(**).	NA	During the Review Period, there were no such instances.
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b>  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 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.	NA	During the Review Period, there were no such instances.
13.	<b>Additional non-compliances, if any:</b>		






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No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc.	NA	
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**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.

  
CS PRIYANKA AKHILESH JAISWAL  
(FCS 13304, M.NO 19133)  
PEER REVIEW NO- 5648/2024  
UDIN- F013304H000545770

Place: NAGPUR  
Dated: 29/05/2026

