



Neeraj Paper Marketing Ltd.

CIN: L74899DL1995PLC066194

Regd. Office : 218-222, Agarwal Prestige Mall, Rani Bagh, Pitampura,
Delhi – 110034 Phone : (91-11) 47527700

E-mail : accounts@neerajpaper.com Website: www.neerajpaper.com

26/06/2020

SCRIP CODE: 539409

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai – 400001

Subject: Annual Secretarial Compliance Report
Ref: SEBI Circular CIR/CFD/CMD1/27/2019 dated Feb 08, 2019

Dear Sirs,

Pursuant to the above SEBI Circular, we enclose herewith Annual Secretarial Compliance Report dated 25th June, 2020 of Neeraj Paper Marketing Limited duly issued by M/s. Shailly Goel & Co. for the financial year ended 31st March 2020.

This is for your information and record.

Yours faithfully,

For Neeraj Paper Marketing Limited

Mansi
(Company Secretary & Compliance Officer)

Shailly Goel & Co.

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF NEERAJ PAPER MARKETING LIMITED FOR THE YEAR ENDED 31/03/2020

We, Shailly Goel & Co., have examined:

- (a) all the documents and records made available to us and explanation provided by Neeraj Paper Marketing 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 financial year ended 31/03/2020 ("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 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 - Not applicable during the review period;
- (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 during the review period;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - Not applicable during the review period;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - Not applicable during the review period;

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- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 - Not applicable 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 (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (j) and circulars/ guidelines issued there under;

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

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, 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. | <i>Regulation 31 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the listed entity shall ensure that hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form.</i> | <i>0.15% of shareholding of promoter group is not in dematerialized form</i> | <i>The company is listed with BSE Limited under Trade- to- Trade segment since hundred percent of shareholding of promoter(s) and promoter group is not in dematerialized form.</i> |

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar 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:

| 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 |
|---------------|------------------------|-----------------------------|--|--|
| NIL | | | | |

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

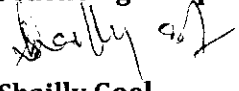
| Sr. No | Observations of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended 31/03/2019 | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|--------|--|--|---|--|
| 1. | Audited financial results for the Quarter and Year ended 31/03/2018 was submitted with the Stock Exchanges after 60 days from the end of the financial year and published in the newspaper after 48 hours of conclusion of the meeting of board of directors at which the financial results were approved. | Audited financial results for the Quarter and Year ended 31/03/2018 was submitted with the Stock Exchanges after 60 days from the end of the financial year and published in the newspaper after 48 hours of conclusion of the meeting of board of directors at which the financial results were approved. | The company has paid the penalty to the Stock Exchange for non-compliance. Also, there is timely submission of all the compliances in the current Financial year. | Non-occurrence of default |
| 2. | 0.15% of shareholding of promoter group is not in dematerialized form. | 0.15% of shareholding of promoter group is not in dematerialized form. | Company has informed the promoter and the demat is pending due to some technical reason. | Company is trying to make good the default |

Shailly Goel & Co.

Company Secretaries

We further report that, the listed entity has complied with points 6(A) and 6(B) as mentioned in SEBI Circular No.CIR/CFD/CMD 1/114/2019 dated 18th October, 2019 and that they have incorporated all the terms and conditions in the respective engagement letter/ supplemental letter issued to the Statutory Auditors.

**For Shailly Goel & Co.
Practicing Company Secretaries**


**Shailly Goel
Company Secretary
FCS No: 8769
C.P. No.: 9196**



**Date: 25th June, 2020
Place: New Delhi
UDIN- F008769B000380844**

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