



Saturday, April 17, 2021

To,
Corporate Compliance Department,
Bombay Stock Exchange Limited,
Mumbai

BSE Script Code: 538795

Subject: Annual Secretarial Compliance Report for the financial year ended 31st March, 2021

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosures) Requirements, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18th October, 2019, Please find enclosed the Annual Secretarial Compliance Report of our Company for the year ended 31st March, 2021, issued by Mr. V. C. Khambhata, Practicing Company Secretary.

You are requested to take the above on record.

Thanking you,

Yours faithfully,

For **SHREE AJIT PULP AND PAPER LIMITED**

Company Secretary and Compliance Officer

Encl: As stated above

SHREE AJIT PULP AND PAPER LIMITED

Regd. Office :

Survey No. 239, Near Morai Railway Crossing,
Village Salvav, Via-Vapi, Dist. Valsad,
Pin.: 396 191, Gujarat, India.
Tel.: +91 260 6635700
Facsimile : +91 260 2437090
CIN : L21010GJ1995PLC025135

Works :

Survey No. 239, Village Salvav, 106, 107, 108P & 105P,
Morai, Near Morai Railway Crossing,
Via-Vapi, Pin.: 396 191, Dist. Valsad, Gujarat, India.
Email : shreeajit@shreeajit.com
Website : www.shreeajit.com

SECRETARIAL COMPLIANCE REPORT
For the year ended 31st March, 2021
[Pursuant to Regulation 24A of SEBI
(Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
Board of Directors of
Shree Ajit Pulp and Paper Limited
Survey No. 239, Near Morai Rly Crossing
Village Salvav, Via-Vapi – 396191, Gujarat



I have examined:

- All the documents and records made available to me and explanation provided by **SHREE AJIT PULP AND LIMITED** (“the listed entity”),
- The filing / submissions made by the listed entity to the stock exchange,
- 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 31st March, 2021 (“Review Period”) in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulations, guidelines issued thereunder; and
- The Securities Contract (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange of India (“SEBI”);

The Specific, Regulations, whose provisions and the circulars / guidelines issued thereunder, have been examined, include:-

- Securities and Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulation, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; Not applicable during the review period.
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) 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.
- 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) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

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
None			

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



	Action taken by	Details of Violation	Details of actions taken E.g. fines, warning letter, debarment, etc.	Observations / remarks of the Practicing Company Secretary, if any.
	None			

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

There being no observation in the Annual Secretarial Compliance Report for the previous year, reporting on actions to comply with its observations does not arise.

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	Not Applicable			



V. C. Khambhata

V. C. KHAMBHATA
COMPANY SECRETARY IN PRACTICE
ACS No. 4887, C.P. No. 6177

UDIN: A004887C000104404

Place: Valsad.

Date: 16-04-2021.