



Saturday, May 27, 2023

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

BSE Script Code: 538795

Subject: Annual Secretarial Compliance Report Pursuant to SEBI Circular

Please find enclosed the Annual Secretarial Compliance Report dated 26th May, 2023 in respect of our Company for the year ended March 31, 2023, issued by Ms. Shilpi Thapar & Associates, Practicing Company Secretary.

This Report has been issued in terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 read with SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18th October, 2019.

You are requested to take the above on record.

Thanking you,
For **SHREE AJIT PULP AND PAPER LIMITED**

Shanoo Mathew
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.: 396191, 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 31 March 2023

**Shree Ajit Pulp and Paper Limited
(CIN: L21010GJ1995PLC025135)**

I, Shilpi Thapar, Practicing Company Secretary have examined,

- (a) All the documents and records made available to me by **Shree Ajit Pulp and Paper Limited**("the listed entity"), and explanation provided by 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 31stMarch 2023, in respect of compliance with the provisions of:

- 1) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 2) 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"); including
 - (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 to the extent if applicable;
 - (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 to the extent applicable;
 - (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018- Not applicable during the year under review;



(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021-Not applicable during the year under review;

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021-Not applicable during the year under review;

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(h)(Other Regulations as applicable)

3. Specific affirmation as required under circular of NSE/BSE:

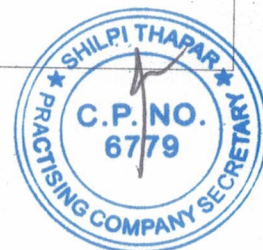
Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI) as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	YES	-
2.	<p>Adoption and timely updation of the Policies:</p> <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 	YES	-
	<ul style="list-style-type: none"> 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	-



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 a 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.	YES	-
5.	Examined Details related to Subsidiaries of listed entities in relation to: (a) Identification of material subsidiary companies	NA	Since the listed entity has no material subsidiary Company
	(b) Disclosure requirement of material as well as other subsidiaries	YES	-
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	YES	



	the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.		
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	YES	
	(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.	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 thereunder.	YES	
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015 including maintenance and compliance of Structured Digital Database	YES	
11.	Actions taken by SEBI or Stock Exchange(s), if any: No actions 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 thereunder.	YES	No actions taken by SEBI/Stock exchanges.



12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	YES	-
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Since the Statutory Auditors have not resigned, during the financial Year 01/04/2022 to 31/03/2023, no comments are given visa-vis compliances related to resignation of statutory auditors from listed entity and its subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.

4) (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, therefore no matter required to be specified below:

Sr. No.	Compliance requirement (Regulations /circulars/ Guidelines incl. specific clauses	Regulation/ Circular No.	Deviations	Action Taken By	Type of Action	Details of violation	Fine Amount	Observations /Remarks	Management response	Remarks
					Advisory/Clarification/ Fine/Show Cause Notice/Warning, etc.					



4. (b) The listed entity has taken following actions to comply with the observations made in previous reports - **Not applicable.**

There were no observations in the report for the previous year and therefore no actions were desired to be taken by the listed entity.

Sr. No.	Compliance requirement (Regulations/circulars/Guidelines incl. specific clauses)	Regulation/Circular No.	Deviations	Action Taken By	Type of Action	Details of violation	Fine Amount	Observations/Remarks	Management response	Remarks
--	--	--	--	--	Advisory/Clarification/Finere/Show Cause Notice/Warning, etc.	--	-	--	--	-

Place: Ahmedabad

Date: 26.05.2023

FOR SHILPI THAPAR & ASSOCIATES
COMPANY SECRETARIES



Shilpi Thapar

CS SHILPI THAPAR
FCS NO. 5492
COP No: 6779
P.R. NO. 1828/2022
UDIN NO: F005492E000387335

This Report is to be read with our letter of even date which is annexed as Annexure A and Forms an integral part of this report.

**ANNEXURE TO ANNUAL SECRETARIAL COMPLIANCE REPORT ISSUED
BY COMPANY SECRETARY IN PRACTICE**

“Annexure-A”

To
The Members,
Shree Ajit Pulp and Paper Limited

Survey no. 239,
Near Morai Railway Crossing,
Village Salvav, Via-Vapi,
Gujarat - 396191 India.

CIN: L21010GJ1995PLC025135

Authorised Capital: Rs. 15,00,00,000/-

Our report of even date is to be read along with this letter:

1. Maintenance of secretarial record is the responsibility of the management of the company. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the company.
4. Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.



5. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on test basis.

6. The Annual Secretarial Compliance report is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.

**For Shilpi Thapar & Associates
Company Secretaries**



Shilpi Thapar
CS Shilpi Thapar

Membership No. : 5492

COP No. : 6779

PR No.1828/2022

UDIN No- F005492E000387335

Place: Ahmedabad

Date: 26.05.2023