

November 14, 2024

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
1st Floor, Dalal Street,
Mumbai 400 001
Scrip Code: 533166

To,
National Stock Exchange of India Ltd.
Exchange Plaza, 5th Floor, Bandra Kurla
Complex, Bandra East,
Mumbai 400 051
Symbol: SUNDARAM

Dear Sir/Madam,

Reference: Intimation of Board Meeting submitted on November 05, 2024.

Subject: Outcome of Board Meeting held on November 14, 2024.

Meeting Commencement time: 03.00 P. M.
Meeting Conclusion time: 04.45 P. M.
Venue: 5/6 Papa Industrial Estate, Suren Road, Andheri (East), Mumbai
400093

Pursuant to Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the meeting of board of directors was held today i.e. **Thursday, November 14, 2024** where board of directors considered and approved following business transactions:

1. The Unaudited Standalone Financial Statement for the quarter and half year ended as on September 30, 2024 along with the Limited Review Report issued thereon.
2. Review and updation of Related Party Transaction Policy.
3. Resignation of M/s. A. V. Shah & Associates, Practicing company secretaries from the position of Secretarial Auditor of the company due to their pre-occupancy in other assignments.
4. Appointment of M/s. Vishwas Sharma & Associates (PR No: 854/2020) as Secretarial Auditor of the company for the Financial Year 2024-2025.

Information required pursuant to Regulation 30 of the SEBI Listing Regulations read with SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023 is enclosed as Annexure-A.

You are requested to take the above cited information on your records.

For **Sundaram Multi Pap Limited**

Urmi Shah
Company Secretary and Compliance Officer
Membership No: A70885

SUNDARAM MULTI PAP LIMITED							
CIN: L21098MH1995PLC086337							
RO: 5/6 Papa Industrial Estate, Suren Road, Andheri (East), Mumbai:400093							
Tel: 022 67602200 E-Mail: info@sundaramgroups.in Website: www.Sundaramgroups.in							
Statement of Unaudited Standalone Financial Results for the Quarter & Half Year Ended September 30, 2024 (Amount Rs in Lacs)							
Sr. No.	Particulars	Quarter Ended			Half Year Ended		Year Ended
		30-09-2024	30-06-2024	30-09-2023	30-09-2024	30-09-2023	31-03-2024
		(Unaudited)	(Unaudited)	(Unaudited)	(Unaudited)	(Unaudited)	(Audited)
I	Income						
	a) Revenue from operations	2,400.275	4,241.907	2,230.200	6,642.182	6,459.400	12,705.133
	b) Other Income	0.279	1.273	18.040	1.552	23.530	28.594
II	Total Income	2,400.555	4,243.180	2,248.240	6,643.735	6,482.930	12,733.727
III	Expenses:						
	a) Cost of materials consumed	1,819.637	2,088.369	2,095.360	3,908.006	5,509.700	10,488.108
	b) Purchase of Stock-in-Trade	63.317	39.190	31.760	102.507	61.110	114.994
	c) Changes in inventories of finished goods, work-in-progress and Stock-in-Trade	(207.720)	841.641	(351.530)	633.921	(433.610)	(671.851)
	d) Employee Benefit Expense	311.014	298.435	269.930	609.449	531.450	1,159.708
	e) Finance Costs	61.169	61.504	77.200	122.673	170.230	346.326
	f) Depreciation & Amortisation Expense	108.576	106.417	102.290	214.993	199.410	414.133
	g) Other Expenses	417.571	602.849	207.920	1,020.420	591.390	1,204.642
IV	Total Expenses	2,573.564	4,038.405	2,432.930	6,611.969	6,629.680	13,056.060
V	Profit/(Loss) from operations before exceptional items and tax (III-IV)	(173.010)	204.775	(184.690)	31.765	(146.750)	(322.332)
VI	Exceptional items	10.453	179.596	50.220	190.049	170.810	185.846
VII	Profit/(Loss) from ordinary activities before tax (V-VI)	(183.462)	25.179	(234.910)	(158.283)	(317.560)	(508.178)
VIII	Tax Expense						
	Current Tax	-	-	-	-	-	-



	(Excess)/Short Provision for earlier Years	-	-	-	-	-	0.001
	Deferred Tax	-	-	-	-	-	-
IX	Net Profit/(loss) for the period (VII-VIII)	(183.462)	25.179	(234.910)	(158.283)	(317.560)	(508.179)
	Other Comprehensive Income						
	(i) Items that will not be reclassified to profit or loss	(0.621)	(0.621)	(0.621)	(1.242)	(1.240)	0.962
	(ii) Items that will be reclassified to profit or loss	-	-	-	-	-	-
X	Other Comprehensive Income for the period	(0.621)	(0.621)	(0.621)	(1.242)	(1.240)	0.962
XI	Total Comprehensive Income for the period (IX+X)	(184.083)	24.558	(235.531)	(159.525)	(318.800)	(507.217)
XII	Paid -up Equity Share capital	4,738.778	4,738.778	4,738.778	4,738.780	4,738.778	4,738.780
	(Face value of the shares ` 1/- each)						
	Other Equity excluding Revaluation Reserve	-	-	-	-	-	4,524.292
XIII	Earnings per equity share						
	a) Basic (Rs.)	(0.039)	0.005	(0.050)	(0.034)	(0.067)	(0.107)
	b) Diluted (Rs.)	(0.039)	0.005	(0.050)	(0.034)	(0.067)	(0.107)

Notes:

- The above unaudited standalone financial results for the quarter and half year ended on September 30, 2024 have been reviewed and recommended by the Audit Committee and have been approved by the Board of Directors at their meeting held on November 14, 2024. The Statutory Auditors have carried out a limited review for quarter and half year ended on September 30, 2024.
- These financial results have been prepared in accordance with Companies (Indian Accounting Standards) Rules, 2015 (IND AS) prescribed under Section 133 of the Companies Act, 2013 and other recognized accounting practices and policies to the extent applicable and in terms of Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- The above financial results are available on the Stock Exchange website (BSE and NSE) and also on the company's website www.sundaramgroups.in.



4. Previous period's figures have been regrouped & rearranged, wherever necessary to make them comparable with the current year.
5. Exceptional Item consists of write back/write off of interest as per Ind AS 116.
6. As on the date of declaration of these financial results, company does not have any subsidiary company hence Consolidated Financial results are not applicable to the company.
7. The Company majorly operates in single business segment of exercise note books & paper. There is no other significant business or geographical segment. Hence, segment reporting is not applicable to the company.

For **Sundaram Multi Pap Limited**

AP Shah
Amrut P Shah
Chairman & Managing Director
DIN: 00033120



Sundaram Multi Pap Limited		
CIN: L21098MH1995PLC086337		
RO: 5/6 Papa Industrial Estate, Suren Road, Andheri (East), Mumbai:400093		
Tel: 022 67602200 E-Mail: info@sundaramgroups.in Website: www.Sundaramgroups.in		
Statement of Assets and Liabilities as at September 30, 2024 (Amount Rs in Lacs)		
Particulars	Unaudited As at 30-09-2024	Audited As at 31-03-2024
ASSETS		
Non-current assets		
Property, Plant and Equipment	6,482.417	6,422.372
Other Intangible assets	394.157	504.137
Financial Assets	-	-
Investments	-	-
Deposit	20.657	29.620
Other	-	-
Other Tax Assets	-	-
Deferred tax assets (net)	-	-
Total Non-Current Assets	6,897.230	6,956.129
Current assets		
Inventories	3,269.384	4,109.796
Financial Assets		
Investments	-	-
Trade receivables	1,597.685	1,187.758
Loans	8.544	4.120
Cash and cash equivalents	1,236.994	22.300
Bank balances other than cash and cash equivalents	7.192	-
Others	666.427	1,125.382
Other current assets	134.440	52.075
Assets classified as held for sale	-	-
Total Current Assets	6,920.665	6,501.431
Total Assets	13,817.896	13,457.560
EQUITY AND LIABILITIES		
Equity		
Equity Share capital	4,738.778	4,738.778
Other Equity	4,364.767	4,524.292
Total Equity	9,103.544	9,263.069
LIABILITIES		
Non-current liabilities		
Financial Liabilities		
Borrowings	2,277.714	2,347.187
Provisions	60.765	47.895
Deferred tax liabilities (Net)	-	-
Total Non-Current Liabilities	2,338.478	2,395.082
Current liabilities		



Financial Liabilities		
Borrowings	1,621.329	838.278
Lease Liability	1.874	18.015
Trade payables - MSME	-	-
Trade payables - other than MSME	447.702	663.949
Other financial liabilities	94.019	84.693
Provisions	-	7.668
Other Current Liabilities	210.949	186.807
Total Current Liabilities	2,375.873	1,799.409
Liabilities directly associated with assets classified as held for sale	-	-
Total Equity and Liabilities	13,817.896	13,457.560



Sundaram Multi Pap Limited				
Cash Flow Statement for the quarter and half Year ended on September 30, 2024				
	Particulars	Half Year Ended		Half Year Ended
		Unaudited		Unaudited
		30-09-2024		30-09-2023
A.	CASH FLOW FROM OPERATING ACTIVITIES:			
	Net Profit / (Loss) Before Tax	(158.283)		(317.55)
	Adjustment For:			
	Provision for Gratuity	-		7.67
	Depreciation	214.99		199.41
	Provision for Debts Written Back	-		-
	Interest Income	(1.12)		(0.73)
	Interest Paid	122.67		170.23
	(Profit)/Loss On Sale Of Assets (Net)	-		(1.00)
			336.54	375.57
	Operating Profit Before Working Capital Changes		178.26	58.02
	Adjustment For:			
	Trade Receivables	(409.93)		(362.37)
	Inventories	840.41		(840.51)
	Loans & Advances	(4.42)		-
	Other Current Assets	265.43		454.17
	Other Non-Current Tax Assets	8.96		(6.86)
	Trade Payables	(216.25)		812.44
	Lease Liability	(16.14)		(10.63)
	Other Financial Liabilities	9.33		41.82
	Other Liabilities & Provisions	24.14		(4.88)
	Assets held for resale	-		-
			501.53	83.19
	Cash Generated from Operations		679.79	141.21
	Direct Taxes Paid (Net)		-	-
	Net Cash Generated From / (Utilised in) Operating Activities		679.79	141.21
B.	Cash Flow from Investing Activities			
	Purchase Of Tangible Fixed Assets (Net)	60.04		(36.11)
	Investment in Gratuity (LIC)	-		(7.67)
	Purchase Of Intangible Fixed Assets (Net)	(109.98)		(7.84)
	Sale Of Tangible Fixed Assets	-		-
	Investment in Shares	-		2.00
	Interest Received	1.12		0.73
	Net Cash Generated From / (Utilised in) Investing Activities		(48.81)	(48.88)



C. Cash Flow from Financing Activities:				
(Repayment of) / Proceeds from Non-Current Borrowings	(69.47)		(59.28)	
(Repayment of) / Proceeds from Current Borrowings	783.05		795.11	
Interest Paid	(122.67)		(170.23)	
Net Cash Generated From / (Utilised in) Financing Activities		590.90		565.60
Net Increase/(Decrease) In Cash and Cash Equivalents (A+B+C)		1,221.89		657.93
Cash And Cash Equivalents at Beginning of The Year	22.30		58.20	
Cash And Cash Equivalents at End of The Period	1,244.19		716.13	
Net Increase/ (Decrease) In Cash and Cash Equivalents		1,221.89		657.93

Note:

1. The above Cash Flow Statement has been prepared under the Indirect method as set out in Indian Accounting standard - AS 7 "Statement of cash flows" issued by the Institute of Chartered Accountants of India.
2. Previous year's figures have been Re-Grouped / Re-Arranged, wherever considered necessary.

For Sundaram Multi Pap Limited

APS Shah

Amrut P Shah
Chairman & Managing Director
DIN: 00033120

To The Board of Directors

Sundaram Multi Pap Limited

Independent Auditors Limited review report on statement of un-audited standalone financial results of Sundaram Multi Pap Limited for the quarter and half year ended 30thSeptember 2024 pursuant to the Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015, as amended.

We have reviewed the accompanying statement of unaudited standalone financial results for the quarter and half year ended 30th September 2024 ("the Statement") of **Sundaram Multi Pap Limited** ("the Company"), attached herewith, being submitted by the Company pursuant to the requirements of Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

Managements Responsibility

This Statement, which is the responsibility of the Company's management and approved by the Board of Directors in their meeting held on 14th November 2024, has been prepared in accordance with the recognition and measurement principles laid down in Indian Accounting Standard 34 ("Ind-AS 34") "Interim Financial Reporting", prescribed under Section 133 of the Companies Act, 2013, as amended, read with relevant rules issued thereunder and other accounting principles generally accepted in India.

Auditors Responsibility

Our responsibility is to issue a report on the Statement based on our review.

We conducted our review of the Statement in accordance with the Standard on Review Engagement (SRE) 2410 "Review of Interim Financial Information Performed by the Independent Auditor of the Entity", issued by the Institute of Chartered Accountants of India. This standard requires that we plan and perform the review to obtain moderate assurance as to whether the Statement is free of material misstatement. A review is limited primarily to inquiries of company personnel and analytical procedures applied to financial data and thus provide less assurance than an audit. We have not performed an audit and accordingly, we do not express an audit opinion.



Basis for Qualified Opinion

- a. *Balances of trade receivables, trade payables, loans and advances are subject to confirmations. Further, no provision has been made for trade receivables which are outstanding since long. This qualification was given in the Financial Statements for the year ended 31st March, 2024 as well and needs to be addressed by the Company.*
- b. *We are unable to comment upon the resulting effect of above para on profit for the quarter and half year, other comprehensive income, other equity and on trade receivable, trade payable, loans & advances and inventories.*

Conclusion

Based on our review conducted as above, apart from above paragraph, nothing has come to our attention that causes us to believe that the accompanying Statement prepared in accordance with the recognition and measurement principles laid down in the aforesaid Indian Accounting Standards ("Ind-AS") prescribed under section 133 of the Companies Act, 2013, as amended, read with relevant rules issued thereunder and other recognized accounting practices and policies has not disclosed the information required to be disclosed in terms of Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, including the manner in which it is to be disclosed, or that it contains any material misstatement.

**For Ashok Shyam and Associates
(Chartered Accountants)
Firm Reg. No. 011223N**



**FCA, Deepak Khanna
(Partner)
Membership No.083466
UDIN: 24083466BKFQCC4036**

**Place: Mumbai
Date: 14th November 2024**

Annexure A

Resignation of M/s. A. V. Shah & Associates, Practicing company secretaries from the position of Secretarial Auditor of the company:

Sr. No.	Particulars	Details
1	Reason of Cessation	Due to their Pre-Occupancy in other assignments
2	Date of Cessation	November 13, 2024

Appointment of M/s. Vishwas Sharma & Associates, Practicing company secretaries at the position of Secretarial Auditor of the company:

Sr. No.	Particulars	Details
1	Name of the Firm	M/s. Vishwas Sharma & Associates
2	Reason for Change	Appointment as a Secretarial Auditor of the Company for FY 2024-2025.
3	Effective Date of appointment	November 14, 2024
4	Term of Appointment	1 Year
5	Brief Profile	CS Vishwas Sharma, Proprietor of M/s. Vishwas Sharma & Associates has experience of more than 10 years in the areas of Company Law, Securities Laws, Due Diligence, Mergers and Acquisitions, Listing of Securities etc.

For **Sundaram Multi Pap Limited**

Urmi Shah
Company Secretary and Compliance Officer
Membership No: A70885



SUNDARAM MULTI PAP LIMITED

Books for Success...

RELATED PARTY TRANSACTION POLICY

1. Preamble

The Board of Directors (the "Board") of Sundaram Multi Pap Limited (the "Company") has adopted the following policy and procedures with regard to entering into transaction with Related Party Transactions (hereinafter referred as "RPT") from time to time, in compliance with the requirements of Section 188 of the Companies Act, 2013 and Rules made there under (the "Act") and the Listing Agreements with the Stock Exchanges ("Listing Agreements").

The Board will review and amend this policy from time-to-time as and when necessary or required. The Audit Committee/Board/General Meeting, as applicable shall, subject to requirements of the Act, Listing Agreements and this Policy review, approve and ratify (if permissible) the RPTs in terms of the requirements of this Policy.

2. Purpose/Objective

This Policy is intended to ensure proper approval and reporting of RPTs as applicable, between the Company and related party(ies) in the best interest of the Company and its Stakeholders, shareholders and compliance with the Act and Listing Agreement norms with the Stock exchanges.

3. Definitions

3.1. "Audit Committee" means the Committee Audit Committee of Board of Directors of the Company constituted under Section 177 of the Act and under the provisions of Listing Agreement with the Stock Exchanges.

3.2. "Board" means Board of Directors of the Company.

3.3. "Key Managerial Personnel" or "KMPs" means a Key Managerial Personnel as appointed by the Board in accordance with Act.

3.4. "Material Related Party Transaction" means a transaction with a related party if the transaction(s) to be entered into individually or taken together with previous transactions or group of transactions in a contract during a financial year, exceeds appropriate thresholds as specified in Annexure I hereto as per the last audited financial statements of the Company.

3.5. "Policy" means this Related Party Transaction Policy.

3.6. "Related" "Related Party" has the meaning assigned to such term:

- (i) Under Section 2(76) of the Act; or
- (ii) Under the accounting Standards as may be in force from time-to-time in relation to Related Party.



SUNDARAM MULTI PAP LIMITED

Books for Success...

3.7. "Related Party Transaction" has the meaning assigned to such term under the Act and the Listing Agreements.

3.8. "Relative" has the meaning assigned to such term under the Act.-

Other term used in this Policy but not defined shall have meaning assigned to such term in the Act or the Listing Agreement (as applicable).

4. Policy

Except as otherwise provided in this Policy, all Related Party Transactions shall be reported to & placed for approval to Managing Director (MD) and subsequently to the Audit Committee in accordance with this Policy.

4.1. Identification of Potential Related Party Transactions:

- a.** The Head of the Departments shall at all times maintain a database of Company's Related Parties containing the names of individuals and Companies in accordance with this Policy, along with their personal/company details including any revisions therein.
- b.** The Related Party List shall be updated whenever necessary and shall be reviewed quarterly.
- c.** The Company Secretary shall gather the information, co-ordinate and send the Related Party List to the concerned employees which may include MD, CFO, Functional Heads, Branch Heads, the Finance & Accounts Department and who he believes might be in the position to know the possible conduct of RPTs.
- d.** Functional departmental heads shall submit to the Company Secretary the details of proposed transaction with details/draft contract/ draft agreement or other supporting documents and information justifying that the transactions are on arms' length basis in an ordinary course of business at prevailing market rate.
- e.** Based on this note, the Company Secretary shall appropriately take up for necessary prior approvals from the Audit Committee at its next meeting and convey the decision taken at the Audit Committee meeting back to the concerned functional head/originator.
- f.** Each director/Key Managerial Personnel shall be responsible for providing written notice to the Company Secretary of any potential RPT involving him or her or his or her Relatives, including any additional information about the transaction that the Company Secretary may reasonably request. The Company Secretary shall, in consultation with other members of senior management and with the Audit Committee, as appropriate, determine whether the transaction does, in fact, constitute a RPT requiring compliance with this Policy.



SUNDARAM MULTI PAP LIMITED

Books for Success...

g. Where any director/ Key Managerial Personnel, who is not so concerned or interested at the time of entering into such contract or arrangement, he or she shall, if he becomes concerned or interested after the contract or arrangement is entered into, disclose his concern or interest forthwith when he or she becomes concerned or interested or at the first meeting of Board held after he or she becomes so concerned or interested.

h. A contract or arrangement entered into by the Company without disclosure or with participation by a Director / Key Managerial Personnel who is concerned or interested in any way, directly or indirectly, in the contract or arrangement, shall be voidable at the option of the Board.

i. The Company strongly prefers to receive such notice of any potential RPT well in advance so that the Company Secretary has adequate time to obtain and review information about the proposed transaction and other matter incidental thereto and to refer it to the appropriate approval authority. Ratification of RPT after its commencement or even its completion may be appropriate in some circumstances.

4.2. Standards for Review:

A RPT reviewed under this Policy will be considered approved or ratified if it is authorized by the Audit Committee or the Board or the shareholders in the General Meeting, as applicable, in accordance with the standards set-forth in this Policy after full disclosure of the Related Party's interests in the transaction. As appropriate for the circumstances, the Audit Committee or Board, as applicable, shall review and consider:

- a.** the Related Party's interest in the RPT;
- b.** the amount involved in the RPT;
- c.** whether the RPT was undertaken in the ordinary course of business of the Company;
- d.** whether the transaction with the Related Party is proposed to be, or was, entered on an arms' length basis;
- e.** the purpose of and the potential benefits to the Company from the RPT;
- f.** whether there are any compelling business reasons for the Company to enter into the RPT and the nature of alternative transaction, if any;
- g.** whether the RPT includes any potential reputational risk issues that may arise as a result of or in connection with the RPT;
- h.** whether the Company was notified about the RPT before its commencement and if not, why pre-approval was not sought and whether subsequent ratification would be detrimental to the Company
- i.** required public disclosure, if any; and



SUNDARAM MULTI PAP LIMITED

Books for Success...

j. any other information regarding the RPT or the Related Party in the context of the proposed transaction that would be material to the Audit Committee/ Board/shareholders, as applicable in light of the circumstances of the particular transaction.

The Audit Committee/Board will review all relevant information available to it about the RPT. The Audit Committee or the Board, as applicable, may approve or ratify or recommend to the shareholders, the RPT only if the Audit Committee and/or the Board, as applicable, determine that, under all of the circumstances, the transaction is fair and reasonable to the Company.

4.3. Procedures for review and approval of Related Party Transactions:

a. All RPTs or changes therein along with relevant documentary supporting (including justification there for) must be reported by Departmental Head to the Company Secretary and be referred to MD and on his confirmation placed before the Audit Committee for prior approval in accordance with this Policy. The Company Secretary shall place summary of such RPTs, material facts relating to each RPT and recommendations for each such RPT for approval of the Audit Committee.

b. The Audit Committee shall undertake an evaluation of each RPT. If such evaluation indicates that the RPT would require approval of the Board, or if the Board elects to review any such RPT, then the Audit Committee shall report such RPTs, together with a summary of material facts, to the Board for its approval.

c. If the Board is of the view that the RPT needs to be approved at a general meeting of the shareholders by way of a special resolution pursuant to the provisions of the Act or the Listing Agreements, then the same shall be placed for approval of the shareholders of the Company.

d. If in case prior approval of the Audit Committee or the Board or the shareholders in general meeting, as applicable, for entering into a RPT is not feasible/not obtained, then the RPT shall be ratified by the Audit Committee / the Board / shareholders in the general meeting or by any other means as may be permissible under the Act, if required, within three (3) months of entering into such a RPT.

e. In the event Audit Committee or the Board or the General Meeting determines not to ratify a RPT as stated in (d) above which has been already acted upon by the Company, then the Committee or the Board or the general meeting, as appropriate, may direct additional actions including, but not limited to, immediate discontinuation of such RPT or approve modifications to such RPT to make it acceptable for ratification. The Audit Committee or the Board shall have an authority to modify or waive any procedural requirements of this Policy so long as such modification or waiver is not inconsistent with the provisions of the Act and the Listing Agreements.



SUNDARAM MULTI PAP LIMITED

Books for Success...

- f.** In determining whether or not to approve or ratify a RPT, the Audit Committee or the Board or the General Meeting shall take into account, among other factors it deems appropriate, whether the RPT is on "arm's length basis, in the ordinary course of Company's business.
- g.** No director or Key Managerial Personnel shall participate in any discussion or approval of a RPT for which he or she is a Related Party, except that the director /Key Managerial Personnel shall provide all material information concerning such Related Party Transaction to the Audit Committee or the Board as appropriate.
- h.** If the RPTs are repetitive in nature, the Audit Committee may grant omnibus approval in line with this policy. The Audit Committee shall satisfy itself the need for such omnibus approval and that such approval is in the interest of the Company;
- i.** The omnibus approval shall specify:
- (i) The name/s of the related party, nature of transaction, period of transaction, maximum amount of transaction that can be entered into,
 - (ii) Such other conditions as the Audit Committee may deem fit.
- Provided that where the need for RPT cannot be foreseen aforesaid details are not available, Audit committee may grant omnibus approval for such transactions subject to their value not exceeding Rs.1 crore per transaction or such higher threshold as may be prescribed in future.
- j.** Thereafter, the Audit Committee shall review at least on a quarterly basis, the details of RTPs entered into by the Company pursuant to each of the omnibus approval given.
- k.** The omnibus approval shall be valid for a period not exceeding one (1) year and shall require fresh approval after the expiry of one (1) year.
- l.** Nothing in this Policy shall override any provisions of law made in respect of any matter stated in this Policy.
- m.** In case any difficulty or doubt arises in the interpretation of this Policy, the decision of the Chairman of the Audit Committee shall be final.

4.4. Disclosures & Registers:

- a.** The Company is required to disclose RPTs in the Company's Board's Report to shareholders of the Company at the Annual General in accordance with the Act and Rules made there under.
- b.** Details of all RPTs requiring shareholders' approval in the general meeting shall be disclosed on a quarterly basis along with Company's Compliance Report on Corporate Governance, in accordance with the Act and the Listing Agreements.



SUNDARAM MULTI PAP LIMITED

Books for Success...

- c.** The Company is also required to disclose this Policy on its website and web link thereto shall be provided in the Annual Report of the Company.
- d.** The Company shall keep and maintain a register, maintained physically or electronically, as may be decided by the Board of Directors, giving separately the particulars of all contracts or arrangements to which this policy applies and such register is placed/taken note of before the meeting of the Board of Directors.
- e.** Every director or Key Managerial Personnel shall, within a period of 30 (thirty) days of this appointment, or relinquishment of his office in other companies, as the case may be disclose the Company the particulars relating to his/her concern or interest in the other association which are required to be included in the register maintained.

4.5. Amendment:

Any subsequent amendment/modification in the Listing Agreement with the Stock Exchanges and/or other applicable laws in this regard shall automatically apply to this Policy.