



**Dated: 29-05-2024**

**To,  
The Manager  
Listing Department  
BSE Limited,  
Floor 25, PJ Towers,  
Dalal Street Fort,  
Mumbai - 400 001**

**Scrip Code: 523840**

**Sub.: Submission of Annual Secretarial Compliance Report for the Year ended 31<sup>st</sup> March, 2024**

**Dear Sir/ Madam,**

In compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015 and SEBI Circular No. CIR/CFD/CMD/27/2019 dated February 8, 2019, please find enclosed herewith copy of Annual Secretarial Compliance Report dated May 29, 2023 for the Financial Year 2023-24 issued by our Secretarial Auditor M/s. Swati M & Associates, Company Secretaries.

This is for your kind information & update the same on your records.

**Thanking you  
Yours' Faithfully  
For Innovative Tech Pack Limited**

**MOHIT** Digitally signed by  
**MOHIT CHAUHAN**  
**CHAUHAN** Date: 2024.05.29  
22:03:42 +05'30'

**Mohit Chauhan  
Company Secretary**

**Encl.: As above**

## **Innovative Tech Pack Ltd.**

**Corp. Office : 801-805, 8th Floor, Tower - 2, Assotech Business Cresterra, Plot No -22, Sector – 135, Noida – 201301  
Ph.: +91 120-5100504**

**Email: [inpack@del2.vsnl.net.in](mailto:inpack@del2.vsnl.net.in), Website: [www.itpigroup.com](http://www.itpigroup.com) CIN: L74999HR1989PLC032412**

**Regd Office: Plot No-51, Roz Ka Meo Industrial Area, Sohna, Distt. Gurugram 122103 (Haryana) India**

**Plant 1 - Plot No 32, Sector – 4, IIE Sidcul, Pantnagar, Distt – U.S.Nagar, Rudrapur – 263145 Uttarakhand**

**Plant 2 - Plot No – 14,15,17 to 21, HPSIDC, Industrial Area Davni, Baddi Distt – Solan – 174101 Himachal Pradesh**

**Plant 3 - Kamrup Paper Mill Complex, Ground Floor, NH-31, Amingaon, Guwahati, Kamrup Assam - 781031 India**

**Plant 4 - Plot No – 245, Sector -8,IMT Manesar, Gurugram – 122051 Haryana**

**Branch Office: Innovative Tech Pack Limited 396/397, 1st Floor, Jain Estate, Park Lane, Secundrabad 500003 India**



**Secretarial Compliance Report of Innovative Tech Pack Limited for the financial year ended 31st March, 2024**

We, Swati M & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by Innovative Tech Pack 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 year ended 31st March, 2024 (“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 there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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;
- (c) Securities and Exchange Board of India(Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India(Buy back of Securities) Regulations,2018; **Not Applicable for the period under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations,2021;**Not Applicable for the period under review**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities)Regulations, 2008; **Not Applicable for the period under review**



(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable for the period under review**

(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 circulars/ guidelines issued there under;

We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

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), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	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	



3.	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>● The Listed entity is maintaining a functional website</li> <li>● Timely dissemination of the documents/ information under a separate section on the website</li> <li>● 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</li> </ul>	YES	
4.	<p><b>Disqualification of Director:</b></p> <p>None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	YES	
5.	<p><b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as Other subsidiaries</p>	NA  NA	The Listed entity does not have any material as well as other subsidiaries
6.	<p><b>Preservation of Documents:</b></p> <p>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.</p>	YES	
7.	<p><b>Performance Evaluation:</b></p> <p>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</p>	YES	



	prescribed in		
	SEBI Regulations.		
8	<b>Related Party Transactions:</b>  (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or  (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.	YES  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 there under except as provided under separate paragraph herein (**).	NA	
12.	<b>Additional Non-compliances, if any:</b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	YES	



Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
<b>1.</b>	<b>Compliances with the following conditions while appointing/re-appointing an auditor</b>		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/audit report for such quarter; or  ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or  iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as The audit report for such financial year.	YES	
<b>2.</b>	<b>Other conditions relating to resignation of statutory audit or</b>		
	i. Reporting of concerns by Auditor with respect to the listed entity / its material subsidiary to the Audit Committee:  a. In case of any concern with the management of the listed entity/ material subsidiary such as non-availability of information/ non-cooperation by the	YES	Pursuant to regulation 30 read with sub clause (7A) of clause A in part A of schedule III of listing regulation



	<p>Management which has hampered The audit process, the auditor has Approached the Chairman of the Audit Committee of the listed Entity and the Audit Committee Shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p>		
	<p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee/ Board of Directors, as the case may be, deliberated on the matter on Receipt of such information from the auditor relating to the proposal to resignas mentioned above and communicate its views to the management andthe auditor.</p>		





	<p><b>ii.</b> Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI/NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>		
3.	<p>The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure-A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019.</p>	YES	

\*Observations/Remarks by PCS are mandatory if the Compliance status is provided as „No“ or „NA

(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:

(b)

Sr. No.	Compliance Requirement (Regulations/ circulars/ guide- lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	the listed company is required to submit details of Related party transactions details on the date of publication of financial results	Reg-23(9) for the quarter ended sept. 2023	delayed in submission of RPT xbrl mode due to technical error in upload	BSE Limited	Fine Imposed	Delay in Compliance	10000	The company has complied and also have paid the fine	inadvertent delay in submission of RPT details	the non-compliance was inadvertent and one time



financial year, within six days from the end of the financial year										
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(a) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/circular/guidelines including specific clause)	Regulation Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practising Company Secretary	Management Response	Remarks
Not Applicable										

FOR SWATI M AND ASSOCIATES  
Company Secretaries

**SWATI**  
**KUMARI**  
(Swati)

Digitally signed  
by SWATI KUMARI  
Date: 2024.05.29  
18:00:26 +05'30'

Membership No. 66995

C.P. NO: 26839

Place: New Delhi Date:  
29.05.2024

UDIN: A066995F000397633

Peer Review no. 5521/2024