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PUDUMJEE PAPER PRODUCTS LTD.

Registered Office

Registered Office: Thergaon, Chinchwad, Pune-411033 Tel:+91-20-40773333, Fax:+91-20-4077 3388 E-Mail : pune@pudumjee.com,sk@pudumjee.com. CIN:L21098PN2015PLC153717 GSTIN 27AAHCP9601Q1ZQ

Corporate Office:

Jatia Chambers, 60, Dr. V.B.Gandhi Marg, Kalaghoda. Mumbai-400001 India. Tel: +91-22-30213333, 22674485, 66339300, Fax: +91-22-22658316. E-Mail: pudumjee@pudumjee.com

21st May, 2019

| The Manager, | The Manager, |
|--|------------------------------------|
| Listing Department, | Corporate Relationship Department, |
| National Stock Exchange of India Ltd., | BSE Ltd., |
| Exchange Plaza, 5 th Floor, | Phiroze Jeejeebhoy Towers, |
| Plot No. C/1, G Block, | Dalal Street, |
| Bandra Kurla Complex, Bandra (E), | <u>MUMBAI - 400 001.</u> |
| <u>Mumbai – 400 051.</u> | |
| | |
| Scrip Code:- PDMJEPAPER | Scrip Code:- 539785 |

Dear Sir/Madam,

Subject: Submission of Annual Secretarial Compliance Report for the Financial Year 2018-19.

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 we have enclosed Annual Secretarial Compliance Report of Pudumjee Paper Products Limited, dated 16th May, 2019 issued by Mr. I. U. Thakur, Practicing Company Secretary for the Financial Year 2018-19 for your information and record.

Thanking you,

Yours Faithfully,

For Pudumjee Paper Products Limited

PF inel Vinay Jadhav

Company Secretary Encl.:- As Above











ISO 14001:2015 IND 16.8578/U/E



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I. U. THAKUR B.COM, LLB, F.C.S. COMPANY SECRETARY MSR Capital. Office No. 15, 2nd Floor, Morwadi Court Road, Pimpri, Pune - 411018. Telephone : 8446903311. E-mail : iuthakur@gmail.com office@iuthakurcs.com Website : www.iuthakurcs.com

Secretarial Compliance Report of PUDUMJEE PAPER PRODUCTS LIMITED for the year ended 31st March, 2019.

To,

Pudumjee Paper Products Limited Thergaon, Chinchwad, Pune-411033

I, I. U. Thakur have examined:

- (a) All the documents and records made available to us and explanation provided by PUDUMJEE PAPER PRODUCTS 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, 2019 ("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 thereunder; 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 to the Company during the Audit 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 to the Company during the Audit Period;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014- Not applicable to the Company during the Audit Period;



- (f) Securities and Exchange Board of India (Issue and listing of Debt Securities) Regulations, 2008- Not applicable to the Company during the Audit Period;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013- Not applicable to the Company during the Audit 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 circulars / guidelines issued thereunder;

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, <u>except</u> in respect of matters specified below:-

| Sr. No. | Compliance Requirement (Regulations / circulars/ guidelines including specific clause) | Deviations | Observations / Remarks of the Practicing Company Secretary |
|------------|---|------------|---|
| - | • | - | - |

- (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/our 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 | Details of Violations | of Details of action Taken e.g. fines, warning letter, debarment, etc. | |
|------------|--------------|--------------------------|---|--|
| - | - | - | - | |

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(d) The listed entity has taken the following actions to comply with the observations made in the 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 31st March, 2018 | Actions taken by the listed entity, if any. | Comments of the Practicing company Secretary on the actions taken by the listed entity |
|------------|---|--|---|--|
| | 11 | Not Appl | icable | |

Place: Pune Date: 16-5-2019 Signature: I. U Thakur Practicing Company Secretary FCS No.2298 C.P. No.1402