



WEST COAST PAPER MILLS LTD.,

Registered & Works Office : Post Box No. 5, Bangur Nagar, Dandeli-581 325
Dist Uttar Kannada (Karnataka) - India

CORPORATE IDENTITY NO : L02101KA1955PLC001936 website : www.westcoastpaper.com
Ph : (08284) 231391 - 395 (5 lines) Fax : 08284-231225 (Admn. Office) 230443 (Works Office)

GSTN:29AAACT4178N1Z0



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May 17, 2023

BSE Limited

Corporate Services
Floor 25, P.J.Towers
Dalal Street,

MUMBAI-400 001

SCRIP CODE – BSE - 500444

National Stock Exchange of India Ltd.

Listing Department
Exchange Plaza
Bandra-Kurla Complex,
Bandra [East]

MUMBAI-400 051

SCRIP CODE – NSE - WSTCSTPAPR

Dear Sirs,

SUB: Annual Secretarial Compliance report as required under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

We enclose herewith Annual secretarial compliance report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the year ended March 31, 2023.

Please take the same on record.

Thanking you,

Yours faithfully,
For WEST COAST PAPER MILLS LTD.

BRAJMOHAN PRASAD
COMPANY SECRETARY
M.NO.F7492

Encl:a.a



Corporate Office : 31, Chowringhee Road, Kolkata - 700 016
Phone : (033) 2265 6271-78 (8 lines), Fax : (033) 2226 5242, Email : wcpm.sale@westcoastpaper.com



SECRETARIAL COMPLIANCE REPORT **For WEST COAST PAPER MILLS LIMITED** **FOR THE YEAR ENDED MARCH 31, 2023**

WE HAVE EXAMINED:

- all the documents and records made available to us and explanation provided by West Coast Paper Mills Limited ("the listed entity");
- the filings/ submissions made by the listed entity to the stock exchanges.
- 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 MARCH 31, 2023 ("REVIEW PERIOD") IN RESPECT OF COMPLIANCE WITH THE PROVISIONS OF:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Company during the Review Period);**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the Company during the Review Period);**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2021 **(Not Applicable to the Company during the Review Period);**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(Not Applicable to the Company during the Review Period);**
- Securities and Exchange board of india (prohibition of Insider Trading) Regulations 2015
- Applicable provisions -Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993.
- Applicable provisions -Securities and Exchange Board of India (Depositories and Participants)) Regulations, 2018.



(j) SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019 regarding Resignation of statutory auditors from listed entities and their material subsidiaries (Not Applicable for the period under review).

(k)

ADDITIONAL AFFIRMATIONS

Sr. No.	Particulars	Compliance Status(Yes/No/NA)	Observations/re marks by PCS
1	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	NIL
2	<u>Adoption and timely updation of the Policies:</u> <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 • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI 	Yes	NIL
3	<u>Maintenance and disclosures on Website:</u> <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	NIL
4	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	NIL
5	To examine details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	No Material Subsidiary & Necessary Disclosers were made about Subsidiary


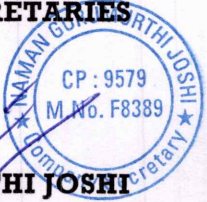
6	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015	Yes	NIL
7	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	NIL
8	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions. (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	Yes NA	NIL There are no such transactions
9	<u>Disclosure of events or information:</u> 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	NIL
10	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	NIL
11	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions 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	NIL
12	<u>Additional Non-compliances, if any:</u>	Yes	NIL

No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.		
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AND BASED ON THE ABOVE EXAMINATION, WE HEREBY REPORT THAT, DURING THE REVIEW PERIOD:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under.
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.
- (c) There was no action 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.
- (d) The listed entity has taken the following action to comply with the observation made in previous reports: **Not Applicable for the period under review.**

**For N G JOSHI & Co
COMPANY SECRETARIES**



NAMAN GURUMURTHI JOSHI
FCS: 8389; CP No. 9579
UDIN:F008389E000309789
PR No. 1477/2021

Date: 15/05/2023

Place: Bengaluru