

COMMITTED TO THE EARTH

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RPL/CS/BSE/NSE/2022-23/

27.05.2022

To

The General Manager, Department of Corporate Service, BSE Limited, P. J. Tower, Dalal Street, Fort, Mumbai-400 023 Scrip Code: **532785** National Stock Exchange of India Limited, Exchange Plaza, Plot No. C/1 G. Block , Bandra Kurla Complex, Bandra (E), Mumbai 400051 Trading Symbol: **RUCHIRA EQ**

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended 31st March 2022: (Ref. SEBI circular no. CIR/CFD/CMD1/27/2019 dated 08th February 2019)

In terms of clause 3(b)(iii) of the above referred SEBI circular, we are submitting the Annual Secretarial Compliance Report of the Company for the year ended 31st March 2022 issued by M/S M. Kumar & Associates, Practicing Company Secretaries and Secretarial Auditor of the Company.

This is for your information, action and record please.

Thanking You,

For Ruchira Papers Limited

Iqbal Singh
Company Secretary and Compliance Officer
A36847

Encl: as above

RUCHTRA PAPERS LIMITED

CIN-L21012HP1980PLC004336

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M. Kumar & Associates

Company Secretaries

UDIN-F011460D000371710

SECRETARIAL COMPLIANCE REPORT of Ruchira Papers Limited For the Financial Year Ended 31st March 2022

(Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015)

We, **M. Kumar & Associates**, Practicing Company Secretaries, through Manoj Kumar, proprietor, have examined:

- (a) all the documents and records made available to us and explanations provided by **Ruchira Papers 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 March 31, 2022 ("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");

Compliances under 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;
- (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; (there were no events requiring compliance during the Review Period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations 2014; (there were no events requiring compliance during the Review Region)
- (f) Securities and Exchange Board of India (Prohibition of Insider Trading) 2015;

M. Kumar & Associates

Company Secretaries

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- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities); Regulations, 2008; (there were no events requiring compliance during the Review Period)
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (there were no events requiring compliance during the Review Period)
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and based on the above examination and considering the relaxations granted by Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of COVID-19 pandemic, 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, except in respect of matters specified below:-

	including specific clause)	case found	Company Secretary
31.110	(Regulations/ circulars / guidelines		of the Practicing
Sr. No	Compliance Requirement	Deviations	Observations/ Remarks

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from 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 there under:

	No such case found			- 8 As
			debarment, etc.	any.
			warning letter,	Company Secretary, if
	by	violation	taken E.g. fines,	of the Practicing
Sr. No.	Action taken	Details of	Details of action	Observations/ remarks

Ghaziabad:- B-31, Brij Vihar, Ghaziabad (U.P)-201011 Email Id:- csmkindia@gmail.com

M. Kumar & Associates

Company Secretaries

Date: 23.05.2022 Place: Ghaziabad UDIN-F011460D000371710

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr.	Observations	Observations	Actions taken by	Comments of the	
No.	of the	made in the	the listed entity, if	Practicing Company	
	Practicing	secretarial	any	Secretary on the	
	Company	compliance		actions taken by the	
	Secretary in	report for the		listed entity	
	the previous	year ended			
	reports	(The years are			
		to be			
		mentioned)			
	Not Applicable				

For M. Kumar & Associates Company Secretaries

(Proprietor)

Membership No.: F11460

CP No: 12439

UDIN No.: F011460D000371710