



JKP/SH/2020

4th June 2020

## **Electronic Filing**

Department of Corporate Services/Listing

**BSE** Limited

Phiroze Jeejeebhoy Towers,

Dalal Street, Fort,

Mumbai - 400 001

Scrip Code No. 532162

National Stock Exchange of India Ltd. Bandra-Kurla

"Exchange Plaza"

Complex, Bandra (E), Mumbai - 400 051

Symbol: JKPAPER

Series : EQ

Dear Sir/Madam,

Re: Annual Secretarial Compliance Report for the financial year ended 31st March

- 1. In continuation to our letter dt. 28<sup>th</sup> May 2020, on the captioned matter, submitted to your exchange on 29<sup>th</sup> May 2020, we wish to further submit that inadvertently, we had enclosed therewith Secretarial Audit Report for the Financial Year ended 31st March 2020, instead of Annual Secretarial Compliance Report, as prescribed in SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019.
- 2. Please find enclosed herewith Annual Secretarial Compliance Report dated May 30, 2020 for the financial year ended 31st March 2020 issued by Shri Namo Narain Agarwal, Practising Company Secretary, in the prescribed format.

We regret for the inconvenience caused to you in this regard.

Submitted for your information and necessary records.

Thanking you

Yours faithfully, For JK Paper Limited

(Deepak Gupta) Company Secretary

Encl: a/a



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Regd. Office : P.O. Central Pulp Mills, Fort Songadh, Dist. Tapi (Guj.)-394660

Ph: 91-2624-220228 / 220278-80, Fax: 91-2624-220138, E-mail: cpm@cpmjk.jkmail.com

CIN L21010GJ1960PLC018099

## NAMO NARAIN AGARWAL

M.Com, L.L.B, Company Secretary, FCS 234, CP 3331

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## Secretarial compliance report of JK Paper Limited for the year ended 31<sup>st</sup> March, 2020

(Pursuant to SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019)

- I, Namo Narain Agarwal, have examined:
  - (a) all the documents and records made available to me and explanation provided by JK Paper Limited (CIN: L21010GJ1960PLC018099) ("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**, **2020** ("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;
- (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 during the review period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable during the review period)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable during the review period)
- (g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

  (Not applicable during the review period) RAINA

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Company Regulations, 2015;

(i) Other regulations as applicable 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, except in respect of matters specified below:-

Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific Clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary			
Nil						

- (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 by	Details of Violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.		
NII NII						

(d) The listed entity has taken the following actions to comply with the observations made in 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 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity			
Not applicable							

The prevailing circumstances in the country on account of Lockdown and COVID-19 have impacted, to some extent, verification of documents and records of the

Place: New Delhi Date: 30<sup>th</sup> May, 2020 UDIN: F000234B000301260

Company Secretary CP 3331 FCS 234

Namo Naram Agarwal FCS 234, CP 3331