



Regd. Offi. / Works

VILL. BHAINSA, 22-Km. STONE, MEERUT-MAWANA ROAD,
P.O. SANDHAN, MAWANA - 250401, U.P. (INDIA)
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sales@sangalpapers.com, website : www.sangalpapers.com

CIN : L21015UP1980PLC005138

PAN NO : AACCS4253J

GSTIN : 09AACCS4253J2Z5

To,
The Secretary,
Bombay Stock Exchange Limited,
P. J. Tower, Dalal Street Fort,
Mumbai - 400001

Date: 29/05/2023

Sec. Code: - 516096

Sec. ID: SANPA

Respected Sir/Madam,

Sub: Submission of Secretarial Compliance Report

Pursuant to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 Dated 08th February, 2019, please find enclosed Secretarial Compliance Report of the Company issued by D. K. Gupta & Co, Practicing Company Secretaries for the financial year ended 31st March, 2023.

Kindly take on your records,

Thanking you,

For Sangal Papers Limited,

Arpit Jain
Company Secretary cum Compliance Officer
M. No. ACS 48332
Place: Mawana

Secretarial Compliance Report of Sangal Papers Limited

For the Financial Year Ended On 31st March 2023

[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th Feb. 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To

The Members,

Sangal Papers Limited

CIN: L21015UP1980PLC005138

Reg. Office: Village Bhainsa, 22 K. M. Mawana Road, Meerut- 250401 UP IN

I, Dinesh Kumar Gupta, Practicing Company Secretary (FCS No. 5226 and C. P. No. 3599) have examined:

- (a) all the documents and records made available to us and explanation provided by Sangal Papers Limited (“the Company”),
- (b) the filings/ submissions made by the Company to the stock exchanges,
- (c) website of the Company,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification.

For the year ended on 31st March 2023 (“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 period under review)**
- (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 period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the company during the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the company during the period under review)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2021; **(Not applicable to the company during 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;

(j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client to the extent of securities issued;

(k) Any circulars/ guidelines issued thereunder

Based on my examination and verification of the documents and records produced to me and according to the information and explanations given to me by the Company, I report that:

Sl. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<u>Secretarial Standard</u> The compliances of the Company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none">■ All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company■ All the policies are in conformity of with SEBI Regulations and has been reviewed & timely updated as per the regulations / circulars / guidelines issued by SEBI.	Yes	
3.	Maintenance and disclosure on website: <ul style="list-style-type: none">• The Company is maintaining a functional website.	Yes	all disclosures generally required to be uploaded on company's website are available

	<ul style="list-style-type: none">Timely dissemination of the documents/ information under a separate section on the website.Web-links provided in annual corporate governance reports under Regulation 27(21) are accurate and specific which redirects to the relevant document(s)/ section of the website		on https://sangalpapers.com/financials/ for financial year 2022-23 as on the date of our report.
4.	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	
5.	Examined the details related to Subsidiaries of the Company: (a) Identification of material subsidiary companies; (b) Requirement with respect to disclosure of material as well as other subsidiaries. (Company is not having any material subsidiaries)	NA	The Company had identified and there were no Material Subsidiary Company of the Company during the review period.
6.	Preservation of Documents: 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,	Yes	

	2015		
7.	Performance Evaluation: 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	
8.	Related Party Transactions: (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	(a) Yes (b) NA	The Company has obtained the prior approval of Audit Committee for all Related party transactions
9.	Disclosure of events or information: 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	
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11.	Actions taken by SEBI or Stock Exchange(s), if any:		

	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	
12.	Additional Non-compliances, if any: Additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NA	No non-compliance observed for all SEBI regulation/circular/guidance note etc

Further, based on the above examination, we hereby report, during the review period that:

- (a) The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -

Sl. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation/ circular No.	Deviations	Action taken by Company	Type of Action	Details of violation	Fine Amt.	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- (b) The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable:

DINESH
KUMAR
GUPTA

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by DINESH
KUMAR GUPTA
Date: 2023.05.29
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D. K. GUPTA & CO.

(Company Secretaries)

Sl. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation/ circular No.	Deviations	Action taken by Company	Type of Action	Details of violation	Fine Amt.	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Place: Meerut

Date: 29th May 2023

UDIN: F005226E000410061 dated 29th May 2023

for D. K. GUPTA & CO.
(Company Secretaries)

DINESH
KUMAR GUPTA

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DINESH KUMAR GUPTA
Date: 2023.05.29
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DINESH KUMAR GUPTA
(Proprietor)

C. P. No. 3599

M. No. F-5226

Peer Review Certificate no. **1993/2022**

Note : This report is to be read with our letter of even date which is annexed as 'ANNEXURE - A' and forms an integral part of this report.

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'ANNEXURE - A'

To

The Members,

Sangal Papers Limited

CIN: L21015UP1980PLC005138

Reg. Office: Village Bhainsa, 22 K. M. Mawana Road, Meerut- 250401 UP IN

My report of even date is to be read along with this letter.

1. Maintenance of Secretarial record is the responsibility of the management of the Company. My responsibility is to express as opinion on these secretarial records based on my audit.
2. I have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Where ever required, I have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of SEBI laws, Corporate and other applicable laws, Rules, Regulations, Standards is the responsibility of management. My examination was limited to the verification of procedure on test basis.
6. The Secretarial Compliance Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Place: Meerut

Date: 29th May 2023

UDIN: F005226E000410061 dated 29th May 2023

for D. K. GUPTA & CO.
(Company Secretaries)

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KUMAR GUPTA

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DINESH KUMAR GUPTA
Date: 2023.05.29
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DINESH KUMAR GUPTA
(Proprietor)

C. P. No. 3599

M. No. F-5226

Peer Review Certificate no. **1993/2022**