



# STAR PAPER MILLS LIMITED

SAHARANPUR - 247 001 (U.P.) INDIA  
CIN No. :- L21011WB1936PLC008726  
Phones : +91 132 6714101 to 6714105, FAX : +91 132 2714121  
E-mail : star.sre@starpapers.com, Web : www.starpapers.com



C/SA/SE/245A

28<sup>th</sup> May, 2019

To,

(1) The National Stock Exchange of India Ltd.  
Exchange Plaza, Bandra Kurla Complex  
Bandra(E)  
Mumbai-400051.

(2) The BSE Ltd.  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai-400001.

**Symbol-'STARPAPER'**

**Stock code-'516022'**

Dear Sir,

**Sub : Annual Secretarial Compliance Report for the FY 2018-19**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report of the company for the FY 2018-19 issued by M/s D. Dutt & Co., Company Secretaries

Kindly acknowledge the receipt.

Thanking you  
Yours faithfully

**For STAR PAPER MILLS LTD.**

**(SAURABH ARORA)**  
**Company Secretary**

**encl:a/a**

Ref: .....

Date: 27 MAY 2019

**Annual Secretarial Compliance Report  
of Star Paper Mills Limited  
for the year ended 31<sup>st</sup> March, 2019  
pursuant to Regulation 24A of SEBI (Listing  
Obligations and Disclosure Requirements) Regulations, 2015**

We, D. Dutt & Co., Company Secretaries have examined:

- (a) all the documents and records made available to us and explanations provided by Star Paper Mills 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 31<sup>st</sup> 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 Review Period]
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; [not applicable to the Company during the Review Period]
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; [not applicable to the Company 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 to the Company during the Review Period]
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 [not applicable to the Company during the Review Period]

and circulars / guidelines issued thereunder:



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 thereunder, **except** in respect of matters specified below:-

<i>Sr. No</i>	<i>Compliance Requirement (Regulations / circulars / guidelines including specific clause)</i>	<i>Deviations</i>	<i>Observations / Remarks of the Practicing Company Secretary)</i>
1.	Regulation 27(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 - Filing of Quarterly Corporate Governance Report for the Quarter ended 31.03.2019	1 (One) day delay	Application has been made by the company to forgive the delay and drop the letter imposing fine.

(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 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:

<i>Sr. No.</i>	<i>Action taken by</i>	<i>Details of violation</i>	<i>Details of action taken e.g. fines, warning letter, debarment etc.</i>	<i>Observations / Remarks of the Practicing Company Secretary, if any)</i>
1.	BSE Limited (BSE) & National Stock Exchange of India Limited (NSE)	1 (One) day delay in Filing of Quarterly Corporate Governance Report for the Quarter ended 31.03.2019	Pursuant to SEBI SOP Circular dated May 03, 2018 a fine of Rs. 2360/- has been imposed by BSE & NSE failing which the action of freezing of promoter	Application has been made by the company to both the Exchanges to forgive the delay and also to drop the letter imposing fine and the matter is still pending.



			holdings for non-payment of fine could be initiated.	
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

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

Place: Kolkata

Date: 27.05.2019

For D. DUTT & CO.  
Company Secretaries  
UNIQUE CODE NUMBER: I2001WB209400



(DEBABRATA DUTT)  
Proprietor  
FCS-5401  
C.P. No.-3824

