

SHREE KARTHIK PAPERS LIMITED

No. 25, 50 Feet Road,
Krishnasamy Nagar, Ramanathapuram,
COIMBATORE - 641 045

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Fax : 0422 - 4217178

E-mail : shreekarthikpapers@yahoo.com

Website : shreekarthikpapers.in

Factory :

Puliyangandi, Aliyar Nagar,
Kottur Village, Anamalai (T.K.)

GST No. : 33AADCS1863K1ZA

CIN : L21012TZ1991PLC003570

Ref.No.SKPL/BSE/2023-24/

27.05.2023

To,

BSE Ltd.
Listing Department,
P.J. Towers,
Dalal Street,
Mumbai-400001.

Dear Sirs,

Sub: Secretarial Compliance Report of the company for the year ended 31st March 2023 as required under Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

We are enclosing herewith the Secretarial Compliance Report of the company for the year ended 31st March 2023 as required under Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 as issued by Mr. S.Rengasamy, Practising Company Secretary, Coimbatore . Kindly take the same on record and acknowledge receipt.

Thanking you,

Yours faithfully,
For Shree Karthik Papers Ltd.,


Managing Director.

Encl: as above

Secretarial Compliance Report of Shree Karthik Papers Limited for the financial year ended 31st March 2023

(Pursuant to Regulation 24(A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019)

I, **S. Rengasamy (FCS 3871 / CP No. 9901) Practising Company Secretary** have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. **SHREE KARTHIK PAPERS LIMITED (CIN No. L21012TZ1991PLC003570)** ("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 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations 1993;
- (e) Securities and Exchange Board of India (Depositories and Participants) Regulations 2018;
- (f) Other regulations and circulars/ guidelines issued by various authorities whatever applicable there under;

(Note: The aforesaid list of Regulations is only illustrative. The list of such SEBI Regulations, as may be relevant and applicable to the listed entity for the review period, shall be added.)

I/We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

| Sr. No | Particulars | Compliance Status (Yes/No/NA) | Observations /Remarks by PCS* |
|--------|--|-------------------------------|--|
| 1. | <p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p> | Yes | The Company has followed the Secretarial Standards issued by the ICSI |
| 2. | <p>Adoption and timely updation of the Policies:</p> <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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI | Yes Yes | The Company has adopted all the applicable policies under SEBI Regulations with the approval of the BD of Directors. All the Policies are in conformity with SEBI Regulations. |
| 3. | <p>Maintenance and disclosures on Website:</p> <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 Yes Yes | Maintained a functional website www.shreekarthikpapaers.in Web-links provided |

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|----|---|-----|---|
| 4. | Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. | Yes | None of the Directors are disqualified u/s 164 of the Companies Act and declaration is received from all directors every year |
| 5. | Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries | NA | No remarks |

| Sr. No | Particulars | Compliance Status (Yes/No/NA) | Observations /Remarks by PCS* |
|--------|--|-------------------------------|---|
| 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, 2015. | Yes | The company is preserving and maintaining records as per SEBI Regulations |
| 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/during the financial year as prescribed in SEBI Regulations. | Yes | The company has conducted Performance evaluation of BD, Independent Directors and Committee performance as per SEBI Regulations |

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Not applicable

| Sr. No. | Particulars | Compliance Status (Yes/No/NA) | Observations /Remarks by PCS* |
|---------|--|--|--|
| 1. | Compliances with the following conditions while appointing/re-appointing an auditor | | |
| | <p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p> | <p align="center">NA</p> <p align="center">NA</p> <p align="center">NA</p> | <p>There has been no resignation of Statutory Auditors for 2022-23</p> |
| 2. | Other conditions relating to resignation of statutory auditor | | |
| | <p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p> a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> | <p align="center">NA</p> | |


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| Sr. No | Particulars | Compliance Status (Yes/No/NA) | Observations /Remarks by PCS* |
|--------|---|---|-------------------------------|
| | <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p> | <p style="text-align: center;">NA</p> <p style="text-align: center;">NA</p> <p style="text-align: center;">NA</p> | |
| 3. | The listed entity / Its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18 th October, 2019. | <p style="text-align: center;">NA</p> | |

*Observations /Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

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|-------------------|--|--|--|--|--|--|--|--|--|--|
| specific clause) | | | | | | | | | | |
| | | | | | Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc. | | | | | |

Place: Coimbatore
Date: 27/05/2023


Subramanian Rengasamy
Practising Company Secretary
M.No. 3871 COPNo. 9901
UDIN No. F003871E000402038
PR No. 2553/2022

S. RENGASAMY B.Com, F.C.S., B.O.L., CAITF
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