



29/05/2024

BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai 400 001

National Stock Exchange of India Limited
Exchange Plaza, Plot No. C/1,
G Block, Bandra – Kurla Complex, Bandra (East),
Mumbai 400 051

Scrip Code: **507779**

Trading Symbol: **KANPRPLA**

Sub.:- Submission of Annual Compliance Report for the financial year 31.03.2024

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 read with SEBI Circular no. CIR/CFD/CMD1/27/2019 DATED 08/02/2019, please find attached herewith Annual Secretarial Compliance Report issued to the Company by M/s Adesh Tandon & Associates, Company Secretaries for the financial year ended 31.03.2024.

Kindly take this on record and oblige.

Thanking you,

Yours faithfully,
For **Kanpur Plastipack Limited**

(Ankur Srivastava)
Company Secretary

Encl:A/a

D19-20 Panki Industrial Area, Kanpur - 208022, India
tel.no: +91 (512) 2691113-116 | fax: +91 (512) 2691117
email: info@kanplas.com | web: www.kanplas.com

**Manufacturers & Exporters: HDPE/PP Circular
Woven Fabrics, Sacks and FIBCS/Jumbo Bags
Multifilament Yarn**

CIN L25209UP09UP1971PLC003444

ISO 9000:2008 ISO 22000 AIB BRC Certified

ADESH TANDON & ASSOCIATES

COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)

Mobile : +91-9839100709

E-mail : adesh.tandon11@gmail.com

SECRETARIAL COMPLIANCE REPORT

For the Financial Year ended March 31st, 2024

To,
Kanpur Plastipack Limited
D 19-20, Panki Industrial Area,
Kanpur, Uttar Pradesh-208022

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Kanpur Plastipack Limited (hereinafter referred as 'the listed entity'), having its Registered office at D 19-20, Panki Industrial Area, Kanpur, Uttar Pradesh-208022. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon, if any.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, We hereby report that the listed entity has, during the review period covering the financial year ended on March 31st, 2024 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter.

I, Adesh Tandon, proprietor of Adesh Tandon & Associates, Company Secretaries,
Kanpur have examined:



ADESH TANDON & ASSOCIATES

COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Mobile : +91-9839100709

E-mail : adesh.tandon11@gmail.com

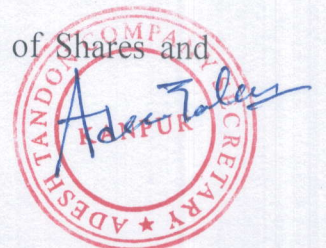
- (a) the filings/ submissions made by the Listed Entity to the stock exchanges;
- (b) website of the Listed Entity;
- (c) any other document/ filing, as may be relevant, which has been relied upon to make this certification;

for the year ended March 31st, 2024 (hereinafter referred to as "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 according to their applicability during the Review Period, include:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations");
- (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;



ADESH TANDON & ASSOCIATES

COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Mobile : +91-9839100709

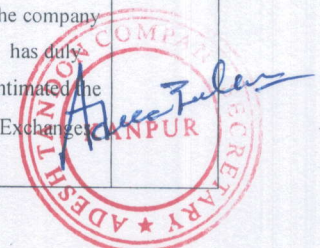
E-mail : adesh.tandon11@gmail.com

- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018(Not applicable during the year);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021(Not applicable to the company during the review period);
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable during the year);
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and based on 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/guide lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	The listed entity is required to give intimation under	Regulation 29 of SEBI (LODR)	The Company was in delay to intimate the Stock Exchange regarding the	BSE and NSE	Fine Imposed	Non Compliance of provisions of Regulation 29(2) and 29(3) of SEBI	10,000/-	To recommend dividend is a separate agenda item and needs to be intimated	The management informed that the company has duly intimated the Exchange	



ADESH TANDON & ASSOCIATES

COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)

Mobile : +91-9839100709

E-mail : adesh.tandon11@gmail.com

regulation	29(1) read	with 29(3)	of SEBI	(LODR)	2015 at	least two	working	days in	advance.	recommendat	ion of	dividend u/r	29(2) and	29(3) of	SEBI	(LODR)	2015	(LODR)	2015	in advance to	the stock	exchanges	which the	company fails	to comply.	about the	board meeting	well in	advance.	However, the	proposal of	dividend	recommendati	on was not in	agenda of the	meeting but	the agenda	item of	dividend was	additionally	taken in the	meeting as any	other agenda	Item on the	request of	independent	directors.
------------	------------	------------	---------	--------	---------	-----------	---------	---------	----------	-------------	--------	--------------	-----------	----------	------	--------	------	--------	------	---------------	-----------	-----------	-----------	---------------	------------	-----------	---------------	---------	----------	--------------	-------------	----------	--------------	---------------	---------------	-------------	------------	---------	--------------	--------------	--------------	----------------	--------------	-------------	------------	-------------	------------

b. The Listed Entity has taken the following actions to comply with the observations made in previous reports:

s. no	Observations / Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	Compliance Requirement (Regulation s/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
Not Applicable						



ADESH TANDON & ASSOCIATES

COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Mobile : +91-9839100709

E-mail : adesh.tandon11@gmail.com

- c. We hereby report that during the Review Period the compliance status of the listed entity with the following requirement is appended as below:

Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<u>Secretarial Standards:</u> The compliances of the Listed Entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	YES	
2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none">• All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the Listed Entity.• All the policies are in conformity with SEBI Regulations and have been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.	YES YES	



ADESH TANDON & ASSOCIATES

COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)

Mobile : +91-9839100709

E-mail : adesh.tandon11@gmail.com

3.	<p><u>Maintenance and disclosures on Website:</u></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. 	<p>YES</p> <p>YES</p> <p>YES</p>	
4.	<p><u>Disqualification of Director:</u></p> <p>None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	<p>YES</p>	
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	<p>NA</p> <p>YES</p>	<p>The Listed Entity does not have any material subsidiary, however the Listed Entity has three WOS namely Bright Choice Ventures Private Limited, Kanplas Earning Solutions Private Limited & Kanplas DO Brasil Ltda.</p>



ADESH TANDON & ASSOCIATES

COMPANY SECRETARIES

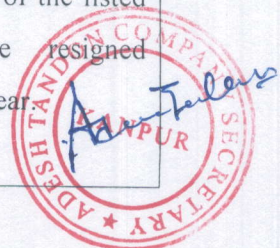
Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)

Mobile : +91-9839100709

E-mail : adesh.tandon11@gmail.com

9.	<p><u>Disclosure of events or information:</u></p> <p>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.</p>	YES	
10.	<p><u>Prohibition of Insider Trading:</u></p> <p>The Listed Entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	YES	
11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>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 there under.</p>	YES	As informed by the Management, no Actions were taken against the Company/ its promoters/ directors/ subsidiaries either by SEBI or by BSE & NSE under SEBI Regulations and circulars/ guidelines issued there under during the year under review, except as disclosed in table a above.
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during	NOT APPLICABLE	No auditors of the listed entity have resigned during the year



ADESH TANDON & ASSOCIATES

COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)

Mobile : +91-9839100709

E-mail : adesh.tandon11@gmail.com

	the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.		
12.	<u>Additional Non-compliances, if any:</u> No other additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.	YES	No additional non-compliance were observed for any SEBI regulation/ circular/guidance note etc. during the year under review.

Assumptions & Limitation of scope and Review:

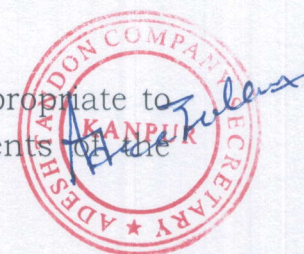
1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.

2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.

3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.

4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficiency or effectiveness with which the management has conducted the affairs of the listed entity.

5. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the



ADESH TANDON & ASSOCIATES

COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)

Mobile : +91-9839100709

E-mail : adesh.tandon11@gmail.com

secretarial records. The verification was done on the random test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.

UDIN: F002253F000454595


Peer Review: 741/2020

Date: May 27, 2024

Place: Kanpur

For ADESH TANDON & ASSOCIATES
Company Secretaries

For ADESH TANDON & ASSOCIATES
COMPANY SECRETARIES



PROPRIETOR
C.P. No. 1121

Adesh Tandon
(Proprietor)
FCS No. 2253
C. P. No. 1121