

29.05.2024

To, **BSE Limited** Phiroze Jeejeebhoy Towers Dalal Street, Mumbai - 400001 Scrip Code: 500356

To, National Stock Exchange of India Limited Exchange Plaza, C-1, Block - G, Bandra Kurla Complex, Bandra (E), Mumbai - 400051

Symbol: RAMANEWS

Subject: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2024

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we hereby submit Annual Secretarial Compliance Report issued by M/s. Ravi Kapoor & Associates, Practicing Company Secretaries, Ahmedabad for the Financial Year ended on 31st March, 2024.

Kindly update the same on your records.

Thanking You,

For Shree Rama Newsprint Limited

Sharad Jain **Company Secretary** Mem. No. F13058



♥ Vilage Barbodhan, Taluka Olpad, District Surat, 395 005, Guj., India 、 02621 - 224203,4,5 ♣ 02621 - 224206 sa ramanewsprint@ramanewsprint.com ∰ www.ramanewsprint.com

CIN: L21010GJ1991PLC019432



Secretarial Compliance Report of Shree Rama Newsprint Limited for the financial year ended 31st March 2024

I, Ravi Kapoor has examined:

- (a) all the documents and records made available to us and explanation provided by Shree Rama Newsprint 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 31st March 2024 ("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; during the year the said regulations were not applicable
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; during the year the said regulations were not applicable







- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; during the year the said regulations were not applicable
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; during the year the said regulations were not 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/ guide-lines including specific clause)	Regu- lation/ Circula rNo.	Deviat ions	Action Taken by	Type of Action	Details of Violation	10 50 11	Observations/ Remarks of the Practicing Company Secretary	Man- age- ment Re- sponse	Re- mar ks
					Advisory / Clarificat ion/ Fine/Sho w Cause Notice/ Warning, etc.	990				

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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr.	Observations/	Observations	Compliance	Details of	Remedial	Comments
No.	Remarks of the Practicing Company Secretary in the previous reports	secretarial compliance	Requirement (Regulations/circulars/ guidelines including specific clause)	violation / deviations and actions taken / penalty imposed, if any, on the listed entity	actions, if any, taken by the listed entity	of the PCS on the actions taken by the listed entity
			Not Applicable			

I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	Secretarial Standards: 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.	Yes	
2.	 Adoption and timely updation of the Policies: 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	







3.	Maintenance and disclosures on Website:	
	The Listed entity is maintaining a functional website	Yes
	Timely dissemination of the documents/ informationunder a separate section on the website	Yes
	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
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
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.:	
	(a) Identification of material subsidiary companies	Yes
	(b) Disclosure requirement of material as well as other subsidiaries	Yes
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
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







8.	Related Party Transactions: (a) The listed entity has obtained prior approval of AuditCommittee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.	Yes	In all related party transactions company has obtained prior approval of Audit Committee and therefore it is mentioned as not applicable.
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 action(s) has been 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 (or). The actions taken against the listed entity / it's promoters / directors / subsidiaries either by SEBI or by Stock Exchange(s) are specified in last column.	Yes	







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Company Secretaries

12.	Resignation of statutory auditors from the listed entity or its material subsidiaries	N.A.	During the year there is no resignation of
	In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during 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.		Statutory Auditors therefore it is mentioned as not applicable.
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	

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

Place: Ahmedabad Date: 29.05.2024 For, Ravi Kapoor & Associates Company Secretaries

Signature: Ravi Kapoor Proprietor

FCS No.: 2587 CP No.: 2407 UDIN: F002587F000487161 PR No: S1996GJ016300