

May 16, 2019

Department of Corporate Services,  
BSE Ltd,  
14<sup>th</sup> Floor, P.J. Towers,  
Dalal Street,  
**MUMBAI – 400 001**

Listing Department,  
National Stock Exchange of India Ltd,  
"Exchange Plaza",  
Bandra-Kurla Complex, Bandra (East)  
**MUMBAI - 400 051**

**(BSE Scrip Code No.502330)**

**(Symbol – IPAPPM Series -EQ)**

Dear Sirs,

Sub: Annual Secretarial Compliance Report pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Clause 3 (b) of SEBI Circular No. CIR/CFD/CMD 1/27 /2019 dated February 8, 2019, we send herewith Secretarial Compliance Report dated May 15, 2019 issued by M/s. D. Hanumanta Raju & Co., Practising Company Secretaries for the financial year ended March 31, 2019.

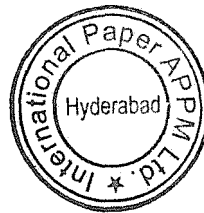
Please take the above report on your records.

Thanking You,

Yours faithfully,  
For INTERNATIONAL PAPER APPM LIMITED

*C. Prabhakar*

**C. PRABHAKAR**  
**SR. VICE PRESIDENT (CORPORATE AFFAIRS) &**  
**COMPANY SECRETARY**



Encl: As above

**INTERNATIONAL PAPER APPM LIMITED**

(Formerly known as The Andhra Pradesh Paper Mills Limited)

(Corporate Identity Number: L21010AP1964PLC001008)

Corp. Office: Krishe Sapphire Building, 8<sup>th</sup> Floor, 1-89/3/B40 to 42/KS/801,  
Hi-tech City Main Road, Madhapur, Hyderabad – 500 081, Telangana, India.

Tel : +91-40-3312 1000 Fax: +91-40-3312 1010 website: www.ipappm.com

Regd. Office: Rajahmundry – 533 105, East Godavari Dist., Andhra Pradesh, India.

**An ISO 9001, ISO 14001 and OHSAS 18001 Certified Company**

Office :  
B-13, F-1, P.S. Nagar,  
Vijayanagar Colony, Hyderabad - 500 057.  
Phone : (●) 91-40-23340985, 23347946, 23341213  
e-mail : dhr300@gmail.com, dhr300@yahoo.com  
website : www.dhanumantarajuandco.com



**CS DATLA HANUMANTHA RAJU**

B.COM., LL.B., PGDT, M.B.A., FCS  
PARTNER

**D. HANUMANTA RAJU & CO.**  
**COMPANY SECRETARIES**

**SECRETARIAL COMPLIANCE REPORT OF  
INTERNATIONAL PAPER APPM LIMITED  
FOR THE YEAR ENDED 31.03.2019**

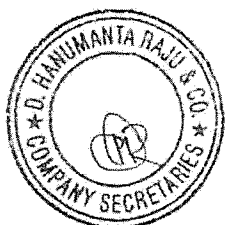
To  
The Members,  
**INTERNATIONAL PAPER APPM LIMITED,**  
Rajahmundry – 533 105,  
East Godavari District,  
Andhra Pradesh.

We, D.Hanumanta Raju & Co, Company Secretaries, having our office at B-13, F-1, P.S.Nagar, Vijayanagar Colony, Hyderabad – 500 057 have examined

- a) all the documents and records made available to us and explanation provided by **INTERNATIONAL PAPER APPM LIMITED**, (“the listed entity”),
- b) the filings/ submissions made by the Company to the stockexchanges,
- c) website of the listed entity,
- d) declaration received from the listed entity on Annual Compliance for the financial Year ended 31<sup>st</sup> March, 2019 (“Review Period”) in respect of compliance with the provisions of:
  1. the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder;and
  2. 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 listed entity 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 listed entity during the period under review)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the listed entity during the period under review)
- f) Securities and Exchange Board of India (Issue and Listing of Debt



Securities) Regulations, 2008; (Not applicable to the listed entity during the period under review)

- g) Securities and Exchange Board of India (Issue and Listing of NonConvertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the listed entity during the period under review)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) 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;
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

and circulars / guidelines issued thereunder and based on the above examination, we hereby report that, during the Review Period:

- (a) The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- (b) The Company 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 Company 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:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	BSE Limited	Regulation 18(1) - Compliance with the Constitution of Audit Committee.	Fine of Rs. 184000 plus GST imposed on the company	Company has replied to the Stock exchanges on the said matter stating that composition of the Audit Committee of the company is in compliance of Regulation 18 as this regulatin does not provide
2	National Stock Exchange of India Limited	Regulation 18(1) - Compliance with the Constitution of Audit Committee.	Fine of Rs. 184000 plus GST imposed on the company	for rounding off any fraction to one. Later the Company has also field writ petition before the Hon'ble High Court for the State of Telangana and



3	National Stock Exchange of India Limited	Regulation 18(1) Non-Compliance with the Constitution of Audit Committee. (received on 10.04.2019)	Not detailed in the letter	Andhra Pradesh ("the Court). The Court has passed an order dated 11.12.2018 directing the Stock Exchanges not to take any coercive steps against the Company and the matter is sub-judice. Later as a measure of Good Corporate Governance, the Audit Committee of the Company has been voluntarily reconstituted by the company with effect from January 30, 2019, comprising of three independent Directors and one Non-Executive Director
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(d) The Company has taken the following actions to comply with the observations made in previous reports: Not Applicable for the period under review.

Place: Hyderabad  
Date: 15.05.2019



For D.HANUMANTA RAJU & CO  
COMPANY SECRETARIES

*Hanumanta Raju*  
CS D HANUMANTA RAJU  
PARTNER  
FCS: 4044, CP NO: 1709