



# Balkrishna Paper Mills Ltd.

Ref: OPS: BPML:SEC&LEGAL:ASCR:2021-22

Date: June 11, 2021

BSE Limited  
Listing Department  
P.J. Tower, Dalal Street,  
Mumbai – 400 001

National Stock Exchange of India  
Limited  
Listing Department  
Exchange Plaza, Plot No. C/1,  
G-Block, Bandra Kurla Complex,  
Bandra (East, Mumbai – 400051

Script Code:**539251**

Symbol :**BALKRISHNA**

ISIN : **INE875R01011**

Dear Sir/ Madam,

**Sub:** Annual Secretarial Compliance Report of the Company for the Financial Year ended 31<sup>st</sup> March, 2021.

In compliance with the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, we are enclosing herewith the Annual Secretarial Compliance Report of the Company for the Financial Year ended 31<sup>st</sup> March, 2021, issued by the Practising Company Secretary, M/s. GMJ & Associates.

Kindly take the above on record and acknowledge.

Thanking you,

Yours faithfully,  
**For Balkrishna Paper Mills Limited**

(Omprakash Singh)

**Company Secretary and Compliance Officer**



Encl: As above

**Registered Office:**

A/7, Trade World, Kamala City, Senapati Bapat Marg, Lower Parel (W), Mumbai - 400 013

Tel: +91 22 6120 7900 | Fax: +91 22 6120 7999 | Email: bpmho@bpml.in | www.bpml.in | CIN : L21098MH2013PLC244963

SECRETARIAL COMPLIANCE REPORT OF BALKRISHNA PAPER MILLS LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021

To,  
The Members,  
Balkrishna Paper Mills Limited  
A/7, Trade World, Kamala City,  
Senapati Bapat Marg,  
Lower Parel (West),  
Mumbai - 400 013.

We, GMJ & Associates, Practicing Company Secretaries have examined:

- a) all the documents and records made available to us and explanations provided by Balkrishna Paper Mills Limited ("the listed entity") through Virtual Private Network (VPN) for our Audit purposes as physical examination of certain documents under SEBI Act and other Regulations made thereunder was not possible due to COVID -19 restrictions in Maharashtra, Mumbai,
- 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, 2021 ("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:-



[Cont...2]

...2...

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 (Buy-Back of Securities) Regulations, 2018 (Not applicable to the company during the review period);
- 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 (Depositories and Participants) Regulations, 2018;
- j) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;

and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the Review Period:



[Cont...3]

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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/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NIL			

b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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:

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
NIL				

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

Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

We further report that during the review period:

a) The Company has reclassified and increased its Authorised Share Capital from Rs. 118.00 crores to Rs. 146.00 crores and consequently, there has been an alteration of the Capital Clause of the Memorandum of Association of the Company;

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...4...

- b) The Company has issued 50,00,000 - 6.5 % Non-Cumulative Redeemable Preference Shares of Rs. 100/- each for cash at par aggregating to Rs. 50.00 crores on preferential basis. Consequently, the Company had allotted 31,00,000 - 6.5% Non-Cumulative Redeemable Preference Shares of 100 each for cash at par as fully paid up to the six Promoters/Promoters Group on Preferential basis on 5th April, 2021. The said preference shares are not listed with the Stock Exchanges.

For GMJ & ASSOCIATES  
Company Secretaries



*Prabhat Maheshwari*

[CS PRABHAT MAHESHWARI]  
PARTNER

M. No. : FCS 2405  
COP No. : 1432  
UDIN : F002405C000422761

PLACE : MUMBAI  
DATE : 4<sup>TH</sup> JUNE, 2021