

# Balkrishna Paper Mills Ltd.

Ref: OPS: BPML:SEC&LEGAL:ASCR:2022-23

Date: May 24, 2022

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**  
ISIN : INE875R01011

Symbol :**BALKRISHNA**

Dear Sir/ Madam,


**Sub: Annual Secretarial Compliance Report of the Company for the financial year ended 31<sup>st</sup> March, 2022.**

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, 2022, 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

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SECRETARIAL COMPLIANCE REPORT OF BALKRISHNA PAPER MILLS LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022

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") bearing CIN: L21098MH2013PLC244963,
- 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, 2022 ("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");

[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]



...3...

- 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, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

[Cont...4]



...4...

We further report that during the review period:

- a) The Company has issued and allotted 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 to the Promoters/Promoters Group during the year ended 31<sup>st</sup> March, 2022. The said 6.5 % Non-Cumulative Redeemable 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 : F002405D000372368

PLACE : MUMBAI  
DATE : 24<sup>TH</sup> MAY, 2022

