



To,  
The Secretary,  
Bombay Stock Exchange Limited,  
P. J. Tower, Dalal Street Fort,  
Mumbai - 400001

Date: 28/06/2022

Sec. Code: - 516096

Sec. ID: SANPA

Respected Sir/Madam,

**Sub: Submission of Secretarial Compliance Report**

Pursuant to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 Dated 08<sup>th</sup> February, 2019, please find enclosed Secretarial Compliance Report of the Company issued by D. K. Gupta & Co, Practicing Company Secretaries for the financial year ended 31st March, 2022.

Kindly take on your records,

Thanking you,

For Sangal Papers Limited,

*Arpit Jain*

Arpit Jain

Company Secretary cum Compliance Officer

M. No. ACS 48332

Place: Mawana



**Secretarial Compliance Report of Sangal Papers Limited**

For the Financial Year Ended On 31<sup>st</sup> March 2022

[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> Feb. 2019]

To

The Members,

**Sangal Papers Limited**

CIN: L21015UP1980PLC005138

Reg. Office: Village Bhainsa, 22 K. M. Mawana Road, Meerut- 250401 UP IN

I, Dinesh Kumar Gupta, Practicing Company Secretary (FCS No. 5226 and C. P. No. 3599) have examined:

- (a) all the documents and records made available to us and explanation provided by Sangal Papers Limited (“the Company”),
- (b) the filings/ submissions made by the Company to the stock exchanges,
- (c) website of the Company,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification.

**For the year ended on 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”);

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;  
**(Not applicable to the company during the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the company during the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the company during the period under review)**
- (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 period under review)**
- (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) Any circulars/ guidelines issued thereunder

Based on my examination and verification of the documents and records produced to me and according to the information and explanations given to me by the Company, I report that:

- (a) The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -

Sl. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	<b>Regulation 27(2)</b> Non-submission of the Corporate governance compliance report for the quarter ended on December 2021 within the period provided under this regulation i.e. (within 21 days from the close of respective quarter)	The requisite Corporate Governance Report For the quarter ended on December 2021 was filed on 24/02/2022	The company received a notice through mail from BSE on 21/02/2022 mentioning the non-compliance of Regulation 27(2) and imposing a fine of Rs. 58000/- plus GST on the Company.  Management reply on the above non-compliance is that the Company has downloaded the xbrl utility on 15/01/2022 and tried to upload the same on that day but due to internet breakdown it could not be uploaded on BSE website. Therefore, non-compliance is not intentional. It is technical due to failure of internet service and requested to BSE to waive off this penalty.

(b) The Company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.

(c) The following actions were taken or to be 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:

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/ remarks of the Practicing Company Secretary, if any.</b>
<b>1.</b>	<b>BSE</b>	<b>Regulation 27(2)</b> Non-submission of the Corporate governance compliance report for the quarter ended on December 2021 within the period provided under this regulation i.e. (within 21 days from the close of respective quarter).	The company received a notice through mail from BSE on 21/02/2022 mentioning the non-compliance of Regulation 27(2) and imposing a fine of Rs. 58000/- plus GST on the Company.	The requisite Corporate Governance Report For the quarter ended on December 2021 was filed on 24/02/2022.  Management reply on the above non-compliance is that the Company has downloaded the xbrl utility on 15/01/2022 and tried to upload the same on that day but due to internet breakdown it could not be uploaded on BSE website. Therefore, non-compliance is not intentional. It is technical due to failure of internet service and requested to BSE to waive off this penalty.

(d) The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	There are no observations made in previous Annual Secretarial Compliance Report.			

Place: Meerut

Date: 30<sup>th</sup> May 2022

**UDIN: F005226D000434611 dated 30<sup>th</sup> May 2022**

**for D. K. GUPTA & CO.**  
(Company Secretaries)

DINESH  
KUMAR  
GUPTA

Digitally signed by  
DINESH KUMAR  
GUPTA  
Date: 2022.05.30  
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**DINESH KUMAR GUPTA**  
(Proprietor)

C. P. No. 3599

M. No. F-5226

Note : This report is to be read with our letter of even date which is annexed as 'ANNEXURE - A' and forms an integral part of this report.

**'ANNEXURE - A'**

To

The Members,

**Sangal Papers Limited**

CIN: L21015UP1980PLC005138

Reg. Office: Village Bhainsa, 22 K. M. Mawana Road, Meerut- 250401 UP IN

My report of even date is to be read along with this letter.

1. Maintenance of Secretarial record is the responsibility of the management of the Company. My responsibility is to express as opinion on these secretarial records based on my audit.
2. I have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Where ever required, I have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of SEBI laws, Corporate and other applicable laws, Rules, Regulations, Standards is the responsibility of management. My examination was limited to the verification of procedure on test basis.
6. The Secretarial Compliance Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Place: Meerut

Date: 30<sup>th</sup> May 2022

**UDIN: F005226D000434611 dated 30<sup>th</sup> May 2022**

**for D. K. GUPTA & CO.**  
(Company Secretaries)

DINESH  
KUMAR  
GUPTA

Digitally signed  
by DINESH  
KUMAR GUPTA  
Date: 2022.05.30  
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**DINESH KUMAR GUPTA**  
(Proprietor)

C. P. No. 3599

M. No. F-5226