



**emami\* paper mills limited**

regd. office : Unit No. 1, 15th floor, ACROPOLIS, 1858/1, rajdanga main road, kasba, kolkata - 700 107  
phone : 91 33 6627 1301 fax : 91 33 6627 1338 e-mail : emamipaper@emamipaper.com website : www.emamipaper.in  
CIN : L21019WB1981PLC034161

EPML/BSE\_NSE/2021-22/  
3<sup>rd</sup> June, 2021

**To**  
**The Secretary**  
**BSE Limited**  
Floor 25, Phirozee Jeejeebhoy Towers  
Dalal Street,  
Mumbai -400001

**To**  
**The Secretary**  
**National Stock Exchange of India Limited**  
Bandra Kurla Complex  
Bandra (East)  
Mumbai-400061

**Scrip Code: 533208**

**NSE Symbol-EMAMIPAP**

Dear Sir,

**Sub: Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2021**

In terms of the requirement under Regulation 24(A)(2) of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015, as amended, we are submitting herewith Secretarial Compliance Report of the Company for the year ended 31<sup>st</sup> March, 2021, issued by M/s. MKB & Associates, Practicing Company Secretaries and the Secretarial Auditors of the Company.

This is for your information and record.

Thanking you,

**For Emami Paper Mills Limited**

**DEBENDRA BANTHIYA**  
**Company Secretary & Compliance Officer**



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

I, Manoj Kumar Banthia, Partner of M/s MKB & Associates, Company Secretaries in Practice, have examined:

- (a) all the documents and records made available to us and explanation provided by **EMAMI PAPER MILLS 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 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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, to the extent applicable, whose provisions and the circulars/ guidelines issued there under, 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued there under;





and based on the above examination and considering the relaxations granted by Ministry of Corporate Affairs and Securities and Exchange Board of India due to COVID-19 pandemic, we hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under., except in respect of matters specified below:-

<i>Sr. No.</i>	<i>Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)</i>	<i>Deviations</i>	<i>Observations/ Remarks of the Practicing Company Secretary</i>
1	Appointment of Independent Woman Director pursuant to proviso to Regulation 17(1)(a) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	There was a delay in appointment of independent woman director on the Board of the Company	The company appointed independent woman director on its Board from 13.08.2020.  Requisite fine has been paid to the stock exchange under protest and the company has applied to the stock exchange for review

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors 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:

<i>Sr. No.</i>	<i>Action Taken by</i>	<i>Details of violation</i>	<i>Details of action taken e.g., fines, warning letter, debarment, etc.</i>	<i>Observations/ Remarks of the Practicing Company Secretary</i>
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1	NSE	There was a delay in appointment of independent woman director on the Board of the Company	Requisite fine imposed and paid to NSE	The company appointed independent woman director on its Board from 13.08.2020.  Requisite fine has been paid to the stock exchange under protest and the company has applied to the stock exchange for review
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(d) The listed entity has taken the following actions to comply with the observations made in the 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, as there were no observation in the previous report				

(e) During the year under review no appointment/ re-appointment/ resignation of statutory auditor of the Company had occurred. The Company has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

For MKB & Associates  
Company Secretaries  
Firm Reg No: P2010WB042700

  
Manoj Kumar Banthia  
Partner

Membership no. 11470  
COP no. 7596

Date: 01.06.2021  
Place: Kolkata  
UDIN: A011470C000408515