



Shree Rajeshwaranand Paper Mills Limited
MANUFACTURERS OF NEWS PRINT, WRITING & PRINTING PAPER
[CIN:L21093GJ1991PLC057244]
Registered Office: Bharuch - Jhagadia Road, Village-Govali, Dist.: Bharuch, Gujarat - 393001
Phone: (02645) 227705 / 6 / 7 / 8 Fax: 91 2645 227709 Mail: s_rajeshwaranand@hotmail.com

28th May, 2019

BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400 001

Company Code No. 516086

Dear Sir,

Sub: Annual Secretarial Compliance Report for the financial year 2018-19

Please note that, pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, the Company has obtained Annual Secretarial Compliance Report for the year 2018-19 from Kashyap R. Mehta & Associates, Practising Company Secretaries.

We are now enclosing herewith the said Annual Secretarial Compliance Report.

This is in compliance with Reg. 24A of SEBI (LODR) Regulations, 2015.

Thanking you,

Yours faithfully,

For SHREE RAJESHWARANAND PAPER MILLS LIMITED

Prakash R. Vora
PRAKASH R. VORA
MANAGING DIRECTOR



Encl: As above

To,
The Board of Directors,
SHREE RAJESHWARANAND PAPER MILLS LIMITED
Village: Govali, Bharuch Jhagadia Road,
Dist. Bharuch, Gujarat – 393 001

Sub.: Secretarial Compliance Report for the year ended on 31st March, 2019

We, **Kashyap R. Mehta & Associates, Company Secretaries, Ahmedabad** have examined:

- (a) all the documents and records made available to us and explanation provided by Shree Rajeshwaranand Paper Mills Limited ("the listed entity/the Company"),
- (b) the filings/ submissions made by the listed entity to BSE Limited
- (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 on 31st March, 2019 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;
---Not applicable during the reporting year-----
- (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 during the reporting year-----
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
---Not applicable during the reporting year-----



(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

---Not applicable during the reporting year-----

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

---Not applicable during the reporting year-----

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

and based on the above examination, 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 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
1.	Point 12 of para II of Annexure to the SEBI Circular No. SEBI/ HO/ MIRSD/ DOP1/ CIR/ P/ 2018/ 73 dated 20 th April, 2018 relating to special efforts to collect copy of PAN, and bank account details of all securities holders holding securities in physical form.	The Company has yet not taken special efforts to collect copy of PAN, and bank account details of all securities holders holding securities in physical form.	The Company is obliged to take special efforts. The Company has placed note for the same in the Annual Report for the year 2017-18.
2.	Website [Pursuant to Reg. 46 of SEBI (LODR) Regulations, 2015]	There is no functional website.	The Company does not maintain functional website.
3.	Appointment of Company Secretary and Compliance officer [Pursuant to Reg. 6 of SEBI (LODR) Regulations, 2015]	The Company did not have Company Secretary as Compliance officer for part of the financial year 2018-19.	There is full time Company Secretary as Compliance officer as on date of report.

(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 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
	-----	Not Applicable -----	-----	-----

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

FOR KASHYAP R. MEHTA & ASSOCIATES
COMPANY SECRETARIES



Place: Ahmedabad
Date: 28th May, 2019

KASHYAP R. MEHTA
PROPRIETOR
FCS-1821 : COP-2052
FRN: S2011GJ166500