



Neeraj Paper Marketing Ltd.

CIN : L74899DL1995PLC066194

Regd. Office : 218-222, Aggarwal Prestige Mall, Road No. 44, Near M2K Cinema,
Pitampura, Delhi-110034 | Ph.: (91-11) 47527700 | Fax : 011-47527777
E-mail: accounts@neerajpaper.com | Website : www.neerajpaper.com

21.05.2025

SCRIP CODE: 539409

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai – 400001

Subject: Annual Secretarial Compliance Report for FY ended 31st March 2025
Ref: SEBI Circular CIR/CFD/CMD1/27/2019 dated Feb 08, 2019

Dear Sirs,

Pursuant to the above SEBI Circular, we enclose herewith Annual Secretarial Compliance Report dated 19th May, 2025 of Neeraj Paper Marketing Limited duly issued by M/s. Anuradha Bhatia & Associates Practicing Company Secretary for the financial year ended 31st March 2025.

This is for your information and record.

Yours faithfully,

For Neeraj Paper Marketing Limited




Deepa Kumari
Company Secretary & Compliance Officer
Add: 218-222 Agarwal Prestige Mall, Plot No. 2
Community Center Along Road No. 44,
Pitampura, Delhi – 110034

Encl: As above

Mumbai Office : F-38, Nand Dham Udyog Premises Co-Op. Society Ltd. Marol Maroshi Road,
Marol, Andheri (East) Mumbai - 400059 | Phone : 022-29201746

Branch Office : 4 Km, Bhopa Road, Behind Petrol Pump, Muzaffarnagar - 251002 (UP)





Anuradha Bhatia & Associates

Company Secretaries

Address: A-3/55, Sector-15, Rohini, New Delhi -110089

E-Mail: anuradhabhatia.cs@gmail.com ; Contact No. : 8178823547

SECRETARIAL COMPLIANCE REPORT OF NEERAJ PAPER MARKETING LIMITED for the financial year ended 31st March 2025

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good Corporate Practices by **Neeraj Paper Marketing Limited** (herein after referred as "the Listed Entity"), having registered office at 218-222, Aggarwal Prestige Mall , Plot No. 2, Community Centre, Along Road No 44 ,Pitampura, Delhi-110034. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts / statutory compliances and expressing our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorised representative during the conduct of Secretarial Review, we hereby report that in our opinion , the listed entity has ,during the review period covering the financial year ended on March 31, 2025 , complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the event , in the manner and subject to the reporting made hereinafter :

We, Anuradha Bhatia & Associates, have examined:

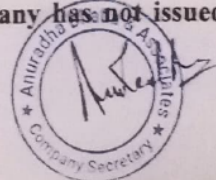
- a) all the documents and records made available to us and explanation provided by **Neeraj Paper Marketing Limited** ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on March 31, 2025 ("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; - **Not Applicable as the company has not issued any securities during the financial year under review ;**





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- 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 as the Company has not bought back /Proposed to buyback any of its securities during the financial year under review ;**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021- **Not Applicable as the Company has not granted any share –base employee benefits and sweat equity during the financial year under review ;**
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;- **Not Applicable as the Company has not issued any debt securities , Non-Convertible and Redeemable Preference Shares during the financial year under review;**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Securities and Exchange Board of India(Investor Education and Protection Fund) Regulation 2009 – **Not applicable during the financial year under review .**

Other regulations as applicable and circulars/ guidelines issued thereunder;

We hereby report that, during the Review Period the compliance status of the listed entity with the following requirements:

Sr.No	Particular	Compliance Status(Yes/No/ NA)	Observations/ Remarks of the Practicing Company Secretary*
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	NIL
2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entitiesAll the policies are in conformity with SEBI Regulations and have been reviewed & timely updated as per the regulations/ circulars/ guidelines issued by SEBI	Yes Yes	NIL NIL
3.	<u>Maintenance and disclosures on Website:</u>		





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	<ul style="list-style-type: none"> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website 	Yes	NIL
		Yes	NIL
		Yes	NIL
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity	Yes	NIL
5.	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Not Applicable	Listed Entity does not have any subsidiary during the F.Y. ending on 31 st March 2025
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	NIL
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	NIL
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	a) Yes b) Not Applicable	NIL Prior approval of Audit Committee



			obtained for all Related Party Transaction.
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	NIL
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	NIL
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	Yes	NIL
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	Not Applicable (NA)	There is no case of resignation by Statutory Auditor during the F.Y. 2024-25 in the listed entity.
13.	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	NIL

*Observation /Remarks by PCS are mandatory if the compliance status is provided as 'No' or 'NA'

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



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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 (Regulation No. s/circulars / guidelines including specific clause	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Re-Marks
NIL										

(b) The Listed entity has taken the following actions to comply with the observations made in previous reports .

Sr. No	Observations/ Remarks of the Practicing Company Secretary in the Previous reports by PCS	Observations made in the Secretarial Compliance Report for the year ended	Compliance Requirement (Regulations/ circulars / guidelines including specific clause	Details of Violation/deviation and action taken/penalty imposed , if any on the listed entity	Remedial actions ,if any taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
NIL						

We further, report that the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations is not applicable on the listed entity during the period under Review.

Assumptions & Limitation of Scope and Review :

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibility of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and





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information. This is neither an audit nor an expression of opinion.

3. We have not verified the correctness and appropriateness of financial Records and Book of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Anuradha Bhatia & Associates

Practicing Company Secretaries

Anuradha Bhatia
(Company Secretary)

ACS No.: 23720

CP No.: 8523

UDIN: A023720G000374807

Peer Review Certificate No. – 5432 / 2024

Date: 19.05.2025

Place: Delhi