ADESH TANDON & ASSOCIATES
COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Tel. : 0512 - 2332397 • **Mobile** : +91-9839100709
E-mail : adesh.tandon11@gmail.com

SECRETARIAL COMPLIANCE REPORT

For the Financial Year ended March 31st, 2023

To,

Kanpur Plastipack Limited
D 19-20, Panki Industrial Area,
Kanpur, Uttar Pradesh-208022

I, Adesh Tandon, proprietor of Adesh Tandon & Associates, Company Secretaries, Kanpur have examined:

(a) all the documents and records made available to us and explanation provided by **KANPUR PLASTIPACK LIMITED** (hereinafter referred to as "the Listed Entity") bearing CIN: L25209UP1971PLC003444 and having its registered office at D 19-20, Panki Industrial Area, Kanpur, Uttar Pradesh – 208022;

(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 March 31st, 2023 (hereinafter referred to as "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

ADESH TANDON COMPANY SECRETARY ★ KANPUR

ADESH TANDON & ASSOCIATES
COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Tel. : 0512 - 2332397 • **Mobile :** +91-9839100709
E-mail : adesh.tandon11@gmail.com

(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 according to their applicability during the Review Period, include:

(a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations");

(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 during the year);**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021**(Not applicable during the year);**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008**(Not applicable during the year);**

(g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013**(Not applicable during the year);**

ADESH TANDON COMPANY SECRETARY ★ KANPUR

ADESH TANDON & ASSOCIATES
COMPANY SECRETARIES

Adesh Tandon
CS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Tel. : 0512 - 2332397 • **Mobile** : +91-9839100709
E-mail : adesh.tandon11@gmail.com

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

I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	**Secretarial Standards:** 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	
2.	**Adoption and timely updation of the Policies:** • All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the Listed Entity. • All 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	



ADESH TANDON & ASSOCIATES
COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Tel. : 0512 - 2332397 • **Mobile :** +91-9839100709
E-mail : adesh.tandon11@gmail.com

Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
3.	**Maintenance and disclosures on Website:**		
	• The Listed Entity is maintaining a functional website.	YES	
	• Timely dissemination of the documents/ information under a separate section on the website.	YES	
	• 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	
4.	**Disqualification of Director:**		
	None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013.	YES	
5.	**To examine details related to Subsidiaries of listed entities:**		
	(a) Identification of material subsidiary companies	NA	The Listed Entity does not have any material subsidiary, however the Listed Entityhas three WOS namely:Bright Choice Ventures Private Limited, Kanplas Earning Solutions Private Limited & Kanplas DO Brasil Ltda.
	(b) Requirements with respect to disclosure of material as well as other subsidiaries	YES	

ADESH TANDON COMPANY SECRETARY KANPUR

ADESH TANDON & ASSOCIATES
COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Tel. : 0512 - 2332397 • **Mobile :** +91-9839100709
E-mail : adesh.tandon11@gmail.com

Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
6.	**Preservation of Documents:** 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	
7.	**Performance Evaluation:** 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	
8.	**Related Party Transactions:** (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.	YES NA	Prior Approval was taken for all Related Party Transactions.

ADESH TANDON COMPANY SECRETARY ★ KANPUR

ADESH TANDON & ASSOCIATES
COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Tel. : 0512 - 2332397 • **Mobile** : +91-9839100709
E-mail : adesh.tandon11@gmail.com

Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
9.	**Disclosure of events or information:** 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	
10.	**Prohibition of Insider Trading:** The Listed Entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** 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 there under.	YES	As informed by the Management, no Actions were taken against the Company/ its promoters/ directors/ subsidiaries either by SEBI or by BSE & NSE under SEBI Regulations and circulars/ guidelines issued there under during the year under review.

ADESH TANDON COMPANY SECRETARY KANPUR

ADESH TANDON & ASSOCIATES
COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Tel. : 0512 - 2332397 • **Mobile** : +91-9839100709
E-mail : adesh.tandon11@gmail.com

Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
12.	**Additional Non-compliances, if any:** No other additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.	YES	No additional non-compliancewere observed for any SEBI regulation/ circular/guidance note etc. during the year under reiew.

Compliances related to resignation of statutory auditors from listed entitics and their material subsidiaries as per SEBI Circular CIR/CFD/CMDI1/114/2019 dated 18% October, 2019:-

No event relating to resignation of auditor has occurred during the review period; hence, this clause is not applicable.

The Additional Disclosures of Annual Secretarial Compliance Report are as below:-

(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/guidelinesincluding specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Typeof Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
---------- Not Applicable ----------										

ADESH TANDON COMPANY SECRETARY KANPUR

ADESH TANDON & ASSOCIATES
COMPANY SECRETARIES

Adesh Tandon
FCS, LL.B., B.Com., AAIMA

811, 8th Floor, KAN Chambers,
14/113, Civil Lines, Kanpur - 208 001 (U.P.)
Tel. : 0512 - 2332397 • **Mobile** : +91-9839100709
E-mail : adesh.tandon11@gmail.com

(b) The Listed Entityhas taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement(Regulations/circulars/guidelinesincluding specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Typeof Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
---------- Not Applicable ----------										

UDIN: F002253E000196581

Peer Review: 741/2020

Date: April 27, 2023

Place: Kanpur

For ADESH TANDON & ASSOCIATES
Company Secretaries

For ADESH TANDON & ASSOCIATES
COMPANY SECRETARIES
PROPRIETOR
C.P. No. 1121

Adesh Tandon
(Proprietor)
FCS No. 2253
C. P. No. 1121