7/Govt/SE-14
31st July, 2020

BSE Limited
Department of Corporate Service
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001
Fax No.(022) 22722061, 41, 39, 37

Scrip Code: 516030
Trading Symbol: YASHPAKKA


Sub: Annual Secretarial Compliance Report for the financial year ended 31st March, 2020

Dear Sir/Madam,


This is for your information and record.

Thanking you,

Yours faithfully,

for Yash Pakka Limited

Sachin Kumar Srivastava
Company Secretary & Head Legal

Encl: As Above
Secretarial Compliance Report of Yash Pakka Limited
For the Financial Year ended March 31, 2020

To,
Yash Pakka Limited
(formerly known as 'Yash Papers Limited')
2nd Floor, 24/57, Birhana Road,
Kanpur, Uttar Pradesh - 208001.

We have examined:

(a) all the documents and records made available to us and explanation provided by Yash Pakka Limited (hereinafter referred to as "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 March 31, 2020 (hereinafter referred 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
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 ("SEBIListing Regulations");

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not applicable to the Company during the Review Period);

(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 Review Period);

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not applicable to the Company during the Review Period);

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the Company during the Review Period);
(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 Review Period);

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

And based on the above examination, I 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:

<table>
<thead>
<tr>
<th>S.N.</th>
<th>Compliance Requirement (Regulations/Circulars/guidelines/including specific clause)</th>
<th>Deviations</th>
<th>Observations/Remarks of the Practicing Company Secretary</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Reg 29(1)(d) read with Reg 29(2) of SEBI Listing Regulations: Listed entity shall give prior intimation to the Stock Exchange about the Board Meeting in which fund raising is due to be considered at least two working days in advance.</td>
<td>Board considered and approved the issue of 'Yash Team Stock Option Plan - 2019' at the Board Meeting held on Aug 11, 2019, but no prior intimation was given to the Stock Exchange.</td>
<td>As informed to us, the said proposal was earlier to be considered in the Board Meeting held on May 11, 2019 and prior intimation was given but said item was deferred.</td>
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<td>2.</td>
<td><strong>CIR/CFD/ CMD1/ 27/2019</strong>: Every listed entity shall submit to the Stock Exchange a Annual Secretarial Compliance Report within 60 days of the end of Financial Year.</td>
<td><strong>Annual Secretarial Compliance Report for the Financial Year ended March 31, 2019</strong> was filed after the due date of May 30, 2019, on June 11, 2019.</td>
<td>As informed to us, there was technically difficulty in filing of the Report, however the same could not be intimated to Stock Exchange at relevant time.</td>
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</table>

| 3. | **Reg 18(1)(b) of SEBI Listing Regulations**: Two-third of the members of Audit | **During the period from 09.11.2019 to 07.02.2020, Composition of Audit Committee was not constituted for very a short period of time, but the** |  |
(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) As informed to us, there are no 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.

(d) The reporting of actions taken by the Listed Entity to comply with the observations made in previous reports:

<table>
<thead>
<tr>
<th>S.N.</th>
<th>Observations of PCS in previous reports</th>
<th>Observations made in the secretarial compliance report for the year</th>
<th>Action taken by the listed entity</th>
<th>Comments of the PCS on the action taken by the listed entity</th>
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<td>Ended (Prior to the Previous Year)</td>
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<tr>
<td>1.</td>
<td>Reg 47(3) of SEBI Listing Regulations: Financial Results for the quarter ended 30.09.2018 and 31.12.2018 were published in newspaper after 48 hours of the conclusion of Board Meeting</td>
<td>N.A.</td>
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<td></td>
<td>Publication of Financial Results in Newspaper were within 48 hours of the conclusion of the Board Meeting, during the reporting period.</td>
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<td></td>
<td>Company has complied with provisions of Reg 47(3) of SEBI Listing Regulations during the review period.</td>
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<td>2.</td>
<td>Regulation 27 of SEBI Listing Regulations: Details of directorship held in other listed entities of 2 Directors and Date of appointment in current term of few Directors were mentioned incorrectly in</td>
<td>N.A.</td>
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<td>The Company made all the necessary corrections as required in the Corporate Governance Report filed with the Stock Exchanges.</td>
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<td>Company adequately has filed the Corporate Governance Report, during the Review Period.</td>
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quarterly Compliance Reports on Corporate Governance filed with Stock Exchange.

Note: The physical verification of the documents could not be done due to the Pandemic Covid-19.

For ADESH TANDON & ASSOCIATES
Company Secretaries

UDIN: F002253B000540296

Place: Kanpur
Date: July 31, 2020

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