

To Corporate Relationship Department, BSE Limited, P.J Towers, Dalal Street, Fort, Mumbai- 400 001 Company Code- 540824	To National Stock Exchange of India Ltd. Exchange Plaza, C-1, Block- G, Bandra- Mumbai- 400 051 Company Code- ASTRON
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Dear Sir / Madam,

Subject: Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclosed Secretarial Compliance Report for the Financial Year ended on 31st March, 2021.

Kindly take the above on your records.

For, Astron Paper & Board Mill Limited



Uttam Patel
Company Secretary
30th June, 2021

Reg Office : D-702, Ganesh Meridian, Opp High Court, S G Highway, Ahmedabad-380060.

Phone No : +91 : 079 - 40081221

Email id : info@astronpaper.com

Website : www.astronpaper.com

CIN:L21090GJ2010PLC063428

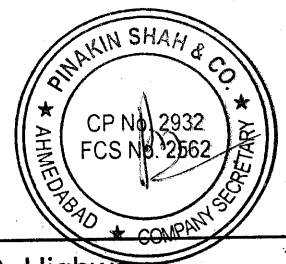
**Secretarial Compliance Report of Astron Paper & Board Mill Limited
for the year ended on March 31, 2021**

We, Pinakin Shah & Co., Practicing Company Secretary have examined:

- a) all the documents and records made available to us and explanation provided by Astron Paper & Board Mill Limited (“a listed entity”),
- b) the filings / submissions made by the a listed entity to the stock exchanges,
- c) website of the a 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, 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 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;
- 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 thereunder.



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

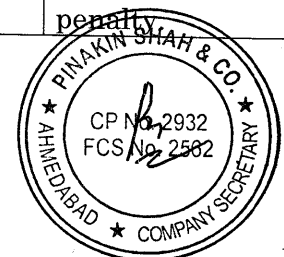
- a) The a listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NIL			

- b) The a listed entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued thereunder insofar as it appears from my/our examination of those records,

- c) The following are the details of actions taken against the a 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:

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.
1	National Stock Exchange of India Limited	For Non Compliance with Regulation 6 & 7 of SEBI (LODR) Regulations, 2015 and Regulation 76 of SEBI (Depositories and Participants) Regulations 2018 For the December, 2020 Quarter.	NSE Letter No : NSE/LIST-SOP/COMB/FINES/0813 DATED 22-02-2021 Regulation 6 of SEBI (LODR) Regulations, 2015 : 1000 per day for 92 days = 92000/- Regulation 7 of SEBI (LODR) Regulations, 2015 : 1000 per day for 92 days = 92000/- Regulation 76 of SEBI (Depositories and Participants) Regulations 2018 : Non Submission	The Company has complied said Regulations with BSE Limited on 12 th January, 2021 (within time limit), but not filed Certificate under Regulation 76 of SEBI (Depositories and Participants) Regulations 2018 with NSE. On the basis of timely filing with BSE Limited, NSE of India Limited has waived penalty



d) The a 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 March 31, 2021	Actions taken by the material subsidiary, if any	Comments of the Practicing Company Secretary on the actions taken by the material subsidiary
NIL				

Date: 29/06/2021
Place: Ahmedabad



For, Pinakin shah & Co.,
Practicing Company Secretary

Pinakin Shah
Pinakin Shah
FCS No.: 2562
C.P. No.: 2932
UDIN: F002562C000541694