



Regd. Offi./ Works

VILL. BHAINSA, 22-km. STONE, MEERUT-MAWANA ROAD,
P.O. SANDHAN, MAWANA - 250401, U.P. (INDIA)

Mob.: 8126131100

E-mail: accounts@sangalpapers.com, sales@sangalpapers.com

Website: www.sangalpapers.com

CIN : L21015UP1980PLC005138

PAN NO : AACCS4253J

GSTIN : 09AACCS4253J2Z5

To,
The Secretary,
Bombay Stock Exchange Limited,
P. J. Tower, Dalal Street Fort,
Mumbai - 400001

Date: 27/05/2026

Sec. Code: - 516096

Sec. ID: SANPA

Respected Sir/Madam,

Sub: Submission of Annual Secretarial Compliance Report

Pursuant to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 Dated 08th February, 2019, please find enclosed Annual Secretarial Compliance Report of the Company issued by D. K. Gupta & Co, Practicing Company Secretaries for the financial year ended 31st March, 2026.

Kindly take it on your records,

Thanking you,

For Sangal Papers Limited,

Anant Vats

Digitally signed by
Anant Vats
Date: 2026.05.27
15:09:15 +05'30'

Anant Vats
Company Secretary cum Compliance Officer
M. No. FCS-5575
Place: Mawana

Secretarial Compliance Report of Sangal Papers Limited

For the Financial Year Ended On 31st March 2026

[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th Feb. 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To

The Members,

Sangal Papers Limited

CIN: L21015UP1980PLC005138

Reg. Office: Village Bhainsa, 22 K. M. Mawana Road, Meerut- 250401 UP IN

I, Dinesh Kumar Gupta, Practicing Company Secretary (FCS No. 5226 and C. P. No. 3599) have examined:

- (a) all the documents and records made available to us and explanation provided by Sangal Papers Limited ("the Company"),
- (b) the filings/ submissions made by the Company to the stock exchanges,
- (c) website of the Company,
- (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 2026 ("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 to the company during the period under review)**
- (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 period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the company during the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2021; **(Not applicable to the company during the period under review)**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Other regulations as applicable;

and circulars/ guidelines issued thereunder

Further in terms of SEBI Circular no SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated December 31, 2024 in respect requirement of disclosure of Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of Listing Regulations.

Based on my examination and verification of the documents and information and explanations given to me by the Company, I report that:

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

| Sl. No. | Compliance Requirement (Regulations/ circulars / guidelines including specific clause) | Regulation/ circular No. | Deviations | Action taken by Company | Type of Action | Details of violation | Fine Amt. | Observations/ Remarks of the Practicing Company Secretary | Management Response | Remarks |
|---------|---|---|----------------|--|---------------------------------|----------------------|--|--|--|---------|
| 1. | quarterly compliance report on corporate governance for the quarter ended on 30 th June 2025 | Regulation 27(2) of the SEBI (LODR) Regulations, 2015 | Delayed filing | Duly filed with fine as imposed by BSE | Notice of fine for delay filing | Delayed filing | Rs. 10,000 (Rupees Ten Thousand only) Plus GST as applicable | Penalty as imposed by Stock Exchange was paid vide UTR No. INB/NEFT/AXODH14011010469/ bse limited / ICICI BANK LIMITED dated 20th May 2026 | Duly filed with fine as imposed by BSE | NIL |
| 2. | to file a quarterly statement of investor grievances and complaints with the recognized stock | Regulation 13(3) of the SEBI (LODR) Regulations, 2015 | Delayed filing | Duly filed with fine as imposed by BSE | Notice of fine for delay filing | Delayed filing | Rs. 5,000 (Rupees Five Thousand only) Plus GST as applicable | Penalty as imposed by Stock Exchange was paid vide UTR No. INB/NEFT/ | Duly filed with fine as imposed by BSE | NIL |

| | | | | | | | | | | |
|---|--|--|--|--|--|--|--|---|--|--|
| Exchanges for the quarter ended on 30 th June 2025 | | | | | | | | AXODH1 4011010 469/ bse limited / ICICI BANK LIMITED dated 20 th May 2026 | | |
|---|--|--|--|--|--|--|--|---|--|--|

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

| Sl. No. | Observations/ Remarks of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended 31 st March 2026 | Compliance Requirement (Regulations/ circulars/ guidelines including specific clause) | Details of violation / deviations and actions 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 | NIL | NIL | NIL | NIL | NIL |

(C) I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

| Sl. No. | Particulars | Compliance status (Yes/No/NA) | Observations /Remarks by PCS* |
|---------|---|-------------------------------|-------------------------------|
| 1. | <u>Secretarial Standard</u> The compliances of the Company 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: <ul style="list-style-type: none">■ All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company■ All the policies are in conformity of with SEBI Regulations and has been reviewed & timely updated as per the regulations / circulars / guidelines issued by SEBI. | Yes | |
| 3. | Maintenance and disclosure on website: <ul style="list-style-type: none">• The Company 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(21) are accurate and specific which redirects to the relevant document(s)/ section of the website | Yes (However, the website maintained by the Company was not accessible during our audit process) | As explained by management, all disclosures generally required to be uploaded on company's website are available on https://sangalpapers.com/financials/ for financial year 2025-26 . Management also explained that the Company has informed the stock exchange vide their letter dated 06/05/2026 and 22/05/2026 that due to unforeseen technical difficulties, their official website, www.sangalpapers.com underwent a website restoration Process. Due to this, certain historic information |

| | | | |
|----|---|-----|--|
| | | | and files have been inadvertently deleted or are temporarily unavailable. Management is in the process of re-uploading and restoring all missing data, documents, and previously disclosed filings to our website in due course. |
| 4. | Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013 | Yes | |
| 5. | Examined the details related to Subsidiaries of the Company: (a) Identification of material subsidiary companies; (b) Requirement with respect to disclosure of material as well as other subsidiaries. (Company is not having any material subsidiaries) | NA | The Company had identified and there were no Material Subsidiary Company of the Company during the review period. |
| 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 | (a) Yes (b) NA | The Company has obtained the prior approval of Audit Committee for all Related party transactions |
| 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 | No | During the year, 1. BSE has imposed a fine of Rs. 10,000/- |

| | | | |
|--|---|--|---|
| | <p>Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.</p> | | <p>(Rupees Ten Thousand only) plus applicable GST for delayed submission of quarterly compliance report on corporate governance for the quarter ended on 30th June 2025 as required under Regulation 27(2) of the SEBI (LODR) Regulations, 2015.</p> <p>2. BSE has imposed a fine of Rs. 5,000/- (Rupees Five Thousand only) plus applicable GST for delayed submission of quarterly statement of investor grievances and complaints for the quarter ended on 30th June 2025 as required under Regulation 13(3) of the SEBI (LODR) Regulations, 2015.</p> |
|--|---|--|---|

| | | | |
|-----|--|----|--|
| | | | The Company has paid the above fine as imposed by Stock Exchange vide UTR No. INB/ NEFT/ AXODH14011010469/ bse limited / ICICI BANK LIMITED dated 20th May 2026 |
| 12. | Resignation of statutory auditors from the listed entity or its material subsidiaries: 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. | NA | There was no such event during the year. |
| 13. | Additional Non-compliances, if any: Additional non-compliance observed for all SEBI regulation/circular/guidance note etc. | NA | Except as mentioned above in this report, No other non-compliance observed for all SEBI regulation/circular/guidance note etc |

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.

3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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.

Place: Meerut

Date: 27th May 2026

UDIN: F005226H000496563 dated 27th May 2026

for D. K. GUPTA & CO.
(Company Secretaries)

DINESH KUMAR GUPTA
Digitally signed by
DINESH KUMAR GUPTA
Date: 2026.05.27
11:10:50 +05'30'

DINESH KUMAR GUPTA
(Proprietor)

C. P. No. 3599

M. No. F-5226

Peer Review Certificate no. 1993/2022