

Dated: 18-05-2022

To, The Manager Listing Department BSE Limited, Floor 25, PJ Towers, Dalal Street Fort, Mumbai - 400 001

Scrip Code: 523840

Sub.: Submission of Annual Secretarial Compliance Report for the Year ended 31st March, 2022

Dear Sir/ Madam

In compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015 and SEBI Circular No. CIR/CFD/CMD/27/2019 dated February 8, 2019, please find enclosed herewith copy of Annual Secretarial Compliance Report dated May 10, 2022 for the Financial Year 2021-22 issued by our Secretarial Auditor M/s. Upender Jajoo & Associates, Company Secretaries.

This is for your kind information & update the same on your records.

Thanking you

Yours' Faithfully

For Innovative Tech Pack Limited

Mohit Chauhan **Company Secretary**

Encl.: As above

Innovative Tech Pack Ltd.

Corp. Office : 801-805, 8th Floor, Tower - 2, Assotech Business Cresterra, Plot No -22, Sector - 135, Noida - 201301 Ph.: +91 120-5100504

Email: inpack@del2.vsnl.net.in, Website: www.itplgroup.com CIN: L74999HR1989PLC032412 Regd Office: Plot No-51, Roz Ka Meo Industrial Area, Sohna, Distt, Gurugram 122103 (Haryana) India Plant 1 - Plot No 32, Sector – 4, IIE Sidcul, Pantnagar, Distt – U.S.Nagar, Rudrapur – 263145 Uttarakhand Plant 2 - Plot No – 14,15,17 to 21, HPSIDC, Industrial Area Davni, Baddi Distt – Solan – 174101 Himachal Pradesh Plant 3 - Kamrup Paper Mill Complex, Ground Floor, NH-31, Amingaon, Guwahati, Kamrup Assam - 781031 India Plant 4 - Plot No – 245, Sector -6,IMT Manesar, Gurugram – 122051 Haryana Branch Office: Innovative Tech Pack Limited 396/397, 1st Floor, Jain Estate, Park Lane, Secundrabad 500003 India





SECRETARIAL COMPLIANCE REPORT OF INNOVATIVE TECH PACK LIMITED For the year ended 31st March, 2022

We, Upender Jajoo. & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **INNOVATIVE TECH PACK LIMITED** ("the listed entity/ITPL"),
- (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 31st March, 2022 ("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) Regulation, 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; *Not Applicable for the period under review*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations,2014; *Not Applicable for the period under review*
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; *Not Applicable for the period under review*

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- Securities and Exchange Board of India (Issue and Listing of Non- Convertible (g) and Redeemable Preference Shares) Regulations, 2013; Not Applicable for the period under review
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) (i) Regulations, 2018

and circulars/ guidelines issued thereunder;

and based on the above examination, we 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:-

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

- (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 our examination of those records.
- The following are the details of actions taken against the listed entity/ its (c) 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:

Sr.	Action	Details of violation	Details of action	Observations /
No	taken		taken E.g. fines,	remarks of the
	by		warning letter,	Practicing Company
			debarment, etc.	Secretary, if any.
1.	N.A.	N.A.	N.A.	N.A.

UPENDE Digitally signed by UPENDER JAJOO

R JAJOO Date: 2022.05.10 09:14:25 +05'30'

Date: 2022.05.10



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

Sr.	Observations of	Observations made in	Actions	Comments of the
No	the Practicing	the secretarial	taken by	Practicing Company
	Company	compliance report for	the listed	Secretary on the
	Secretary in the	the year ended 222	entity, if	actions taken by the
	previous reports	(The years are to be	any	listed entity
		mentioned)		
N.A.	N.A.	N.A.	N.A.	N.A.

For Upender Jajoo & Associates, Company Secretaries, ICSI Unique Code: I2015HR1272100 UPENDE Bigitally signed by UPENDER JAJOO Date: 2022.05.10 09:14:46 +05'30' Signature: ______ Name of the Practicing Company Secretary: CS Upender Jajoo FCS No.: 10155 C P No.: 14336 UDIN: F010155D000293592

Place: New Delhi Date:10th May, 2022