Ref: SUBAM/BSE/18 /2026

Date: May 28, 2026

To,
The Manager (Listing),
BSE Limited,
P. J. Towers,
Dalal Street, Mumbai – 400001

Dear Sir/ Madam,

Scrip Code: 544267

Sub: Annual Secretarial Compliance Report for the year ended 31st March 2026

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 (as amended), we enclose a copy of the Annual Secretarial Compliance Report duly signed by the Practicing Company Secretary for the year ended 31.03.2026. Please take the same on record.

Thanking you

Yours faithfully,

For Subam Papers Limited

T BALAKUMAR
Digitally signed by T BALAKUMAR
Date: 2026.05.28 16:50:42 +05'30'

SUBAM PAPERS LIMITED * TIRUNELVELI *

Managing Director
T. Balakumar
DIN: 00440500

Place: Vaduganpatti / Tirunelveli

SUBAM PAPERS LIMITED
Reg. Off. S.F.No. 143-146, Vaduganpatti Village, Nadukallur to Tirunelveli, Tirunelveli Taluk. Tirunelveli - 627 010, Tamil Nadu, India.
Contact No: 9489926130, E-mail ID: finance@subampapers.com
Website: www.subampapers.com
CIN No : U21012TN2004PLC054403, GSTIN:33AAICS5376E1ZA
L21012TN2004PLC054403

JOHN O. & ASSOCIATES

Company Secretarial Auditors

Dr. J. John Ohilvi, M.Com., L.L.B., FCS., Ph.D., IP, RV
Company Secretary, Insolvency Professional, Registered Valuer, Forensic Auditor & Social Auditor

3/95A, East of Medical College,
Asaripallam - 629201,
Nagercoil, Tamil Nadu.
Cell: 098421-34891, 095788-08888
Ph: 04652-234289
E-mail: johnohilvi@yahoo.co.in
Website: www.johnohilvi.com

Date: ....

SECRETARIAL COMPLIANCE REPORT OF SUBAM PAPERS LIMITED

For the financial year ended March 31, 2026

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **SUBAM PAPERS LIMITED** having CIN: L21012TN2004PLC054403 (hereinafter referred as "the Company"), having its Registered Office at S.F.No.143-146 Vaduganpatti Village, Nadukallur To Tirunelveli, Tirunelveli Taluk, Tamil Nadu, India, 627010. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/ statutory compliances and to provide our observations thereon.

Based on our verification of the Company's books, papers, minutes books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the Company has, during the review period covering the financial year ended March 31, 2026, has complied with the statutory provisions listed hereunder and also that the Company has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, John O & Associates, Secretarial Auditors of **Subam Papers Limited** ("the Company") have examined:

all the relevant documents and records made available to us through virtual data room/ physical form and the explanations provided by the Company for the purpose of our audit,

a) the filings/ submissions made by the Company to the stock exchange(s),
b) website of the Company,
c) any other documents/ filings, as may be relevant, which have been relied upon to make this Report.

J. JOHN OHILVI, FCS
M. No. F-4313
CP. No. 4310
COMPANY SECRETARY

The foregoing information for the financial year ended March 31, 2026 ("Review Period") in respect of the 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
b) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015; The Company has also maintained a Structured Digital Database ("SDD") pursuant to the requirements of Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
c) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR");
d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
e) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;
f) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993;

and the circulars/ guidelines issued thereunder; and based on the above examination, we hereby report that, during the review period:

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

Sr. No. (a)	Compliance Requirement (Regulations/circulars/ Guidelines/including specific clause (b)	Regulation / Circular No. (c)	Deviations (d)	Action Taken by (e)	Type of Action (f)
None					

J. JOHN OHILVI, FCS
M. No. F-4513
CP No. 4010
COMPANY SECRETARY

Details of Violation	Fine Amount (h)	Observations/ Remarks of the Practicing Company Secretary (i)	Management response (j)	Remarks (k)
		None		

b) The Company has taken the following action to comply with the observations made in previous reports:

Sr. No. (a)	Observations/ Remarks of the Practicing Company Secretary In the previous reports (PCS)	Observations made in the Secretarial compliance report for the year ended	Compliance Requirements	Details of violation/deviations and actions taken / penalty imposed, if any	Remedial actions if any taken by the Company	Comments of the PCS on the actions taken by the Company
			None			

I. We hereby report that during the review period, the compliance status of the Company with the following requirements : -

Sr. No.	Particulars	Compliance Status (Yes / No / NA)	Observations / Remarks by PCS
1.	Secretarial Standards: The compliances of the Company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Yes Company Secretaries India (ICSI).	Yes	Complied
2.	Adoption and timely updation of the Policies: • All applicable policies under SEBI Regulations are adopted with the due approval of Board of Directors of the Company. • All the policies are in conformity with Yes Complied SEBI Regulations and has been reviewed and timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	Complied
3.	Maintenance and disclosure on Website: • The Company is maintaining a functioning website. • Timely dissemination of the documents/ information under a separate section on the website • Web-links provide in annual	Yes	Complied

J. JOHN OHILVI, FCS M. No. F-4513 C.P. No. 24010 COMPANY SECRETARY

	corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website		
4.	Disqualification of Directors: None of the Director(s) of the Company is disqualified under Section 164 of the Companies Act, 2013 as confirmed by the Company.	Yes	Complied
5.	Details related to Subsidiaries of the Company have been examined w.r.t (a) Identification of material subsidiary companies (b) Disclosure Requirements of material as any other subsidiaries	Yes	Complied
6.	Preservation of Documents: The Company 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	Yes	Complied
7.	Performance Evaluation: The Company 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	Complied
8.	Related Party Transactions: a) The Company has obtained prior approval of Audit Committee for all related party transactions. b) In case no prior approval obtained, the Company shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee.	Yes	Complied
9.	Disclosure of events or information: The Company has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR within the time limits prescribed thereunder.	Yes	Complied

10.	Prohibition of Insider Trading The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	Complied
11.	Actions taken by SEBI or Stock Exchange(s), if any: No Actions taken against the Company/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 thereunder (or) The actions taken against the Company/ its promoters/ directors/subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	NA	No actions were taken by SEBI or by the Stock Exchanges during the Review Period including under the Standard Operating Procedures issued by SEBI through various circulars.
12.	Resignation of Statutory auditors from the Company or its material subsidiaries: In case of resignation of statutory auditor from the Company or any or its material subsidiaries during the financial year, the Company and / or its material subsidiaries 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 SEBI LODR by Listed entities	NA	There has been no resignation by the Statutory Auditor of the Company during the review period.
13.	Additional non-compliances, if any: Any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc. except as reported above	NA	No additional non-compliance has been observed during the Review Period. However the discloser filed under regulation 13(3) of SEBI LODR in XBRL FORM subsequently filed in new format (Integrated Governance Filing) and regularized.

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 Company.

2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.

J. JOHN OHILVI, FCS
M. No. F-4513
CP. No. 4010
COMPANY SECRETARY

3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the Company.

4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI LODR and is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

For JOHN O & ASSOCIATES
Company Secretaries

J. JOHN OHILVI, FCS
M. No.
F - 4513
CP. No. 4010
COMPANY SECRETARY

Place: Nagercoil
Date: 26/05/2026

JOHN OHILVI
FCS: 4513 / CP: 4010
Peer Review No.: 3328/2023

UDIN : F004513H000481473