



To,
Securities and Exchange Board of India,
Plot No.C4-A, 'G' Block,
Bandra Kurla Complex,
Bandra East,
Mumbai – 400 051.

June 15, 2016

Dear Sirs,

Sub: SEBI Order in the matter of Sharepro Services (I) Pvt. Ltd.

Pursuant to your Order bearing reference no. WTM/RKA/MIRSD2/41/2016 dated 22nd March, 2016 directed the client of Sharepro Services (India) Pvt. Ltd (Sharepro) to conduct the thorough audit of the records and system of Sharepro with respect to dividend paid and transfer of securities, we, accordingly, appointed M/s. P. Naithani & Associates, Company Secretaries, Mumbai to conduct the audit and submit the Report.

Further, we wish to inform you that the Nirvikara Paper Mills Ltd was incorporated on 29th June, 2013 and listed first time with both BSE & NSE on 28th July, 2015. Hence, past 10 years audit report in our case is not applicable. The company has never declared dividend, therefore discrepancies regarding payment of dividend does not arise, which may please be noted.

However, as desired, we now submit herewith the Audit Report dated 14th June, 2016 issued by M/s. P. Naithani & Associates, Company Secretaries, Mumbai, for your perusal and record. You will observe from the said report that there were no violation taken place in respect of payment of dividend and transfer of securities.


Further, we have taken necessary steps to switchover the activities related to Sharepro, existing Registrar to an issue and Share Transfer Agent (RTA) and appointed M/s. Sharex Dynamic (India) Pvt. Ltd., Unit no.1, Luthra Ind. Premises, Safed Pool, Andheri Kurla Road, Andheri (East), Mumbai – 400072, as a new RTA of the Company.

The above is submitted for your kind information and record.

Kindly acknowledge receipt.

Thanking you,

Yours faithfully,
For and on behalf of
Nirvikara Paper Mills Ltd


(Omprakash Singh)
Company Secretary

Encl: As above.
CC: NSE/BSE



P. NAITHANI & ASSOCIATES

Company Secretaries

902, B Wing, Venus Tower, Veera Desai Road, Andheri (W), Mumbai - 400 053.

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Audit Report pursuant to SEBI Order No. WTM/RKA/MIRSD2/41/2016 dated 22.03.2016 in the matter of Sharepro Services (India) Private Limited

To,
The Board of Directors
Nirvikara Paper Mills Limited
A7, Trade World, Kamala City,
Senapati Bapat Marg,
Lower Parel (West),
Mumbai-400021.

Dear Sir/Madam,

We have conducted the audit of the records and systems of Sharepro Services (India Private Limited (Sharepro) in respect of dividends paid and transfer of securities of Nirvikara Paper Mills Limited (NPML) for the period 28th July 2015 to 31st March 2016 (the company was listed on both the Exchanges i.e BSE & NSE on 28/07/2015). The audit was conducted in a manner that provided us a reasonable basis for evaluating the compliances in respect of dividend paid and transfer of securities and expressing our opinion.

A. Transfer of Securities

We have examined the documents, papers, forms and other records maintained by Sharepro in respect of the following:

1. Share transfers including physical share transfers.
2. Dematerialization Requests.
3. Register of members and Register of share Transfers.

During the course of our audit we have visited the offices of Sharepro at Marol (Sakinaka), Mumbai, to carry out the physical verification of share transfers and other documentation relating to the aforesaid issues.



Based on the verification of the documents, records and registers provided by Sharepro and the explanations and clarifications issue by the personnel of Sharepro and the personnel of NPML, we have arrived at the conclusion that regular quarterly audit has been carried out for all the share transfers and we report that all the transfers have been correctly recorded.

In cases of inequality of certain information or improper documentation, objections have been raised by Sharepro and clarifications have been sought. On satisfaction of all the queries or objections, the transfers/transmissions have been executed.

B. Dividend paid:

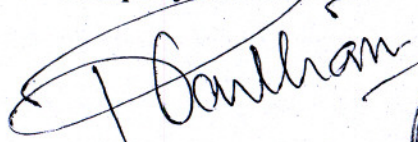
The Company has not declared and paid any dividend since the company being listed on both the Exchanges:

We further report that there are adequate systems and processes in the Company to monitor and ensure compliance with applicable laws, rules and regulations in respect of transfer of shares.

Thanking you,

Yours truly,

For P. Naithani & Associates
Company Secretaries



P. Naithani
FCS No. 3830
CP No.3389



Date: 14th June 2016
Place: Mumbai: