



INDIAN SUCROSE LIMITED



Date: 21.05.2020

To
The Manager
The BSE Limited
Department of Corporate Services
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400001.

Ref.: Scrip Code: - 500319

SUBJECT- ANNUAL SECRETARIAL COMPLIANCE REPORT OF THE COMPANY FOR THE YEAR ENDED MARCH 31ST ,2020

Dear Sir/Madam,

In terms of Clause 3(b) of the SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 8,2019 please find enclosed the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2020, issued by Ms. Shukti Ojha Pandit, Practicing Company Secretary .

We request you to kindly take the above on record.

Thanking you,

Yours faithfully,

For Indian Sucrose Limited

Anamika Raju
Company Secretary



SHUKTI OJHA

COMPANY SECRETARY

C 364 (Basement), Vikaspuri,

New Delhi, Delhi - 110018

0950845885; 01145733115

csshuktiojha@gmail.com

I, Shukti Ojha, Company Secretary in Practice, have examined:

- a) all the documents and records made available to us and explanation provided by **Indian Sucrose Limited** ("the listed entity"),
- 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 certificate, for the year ended **31st March, 2020** ("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 based on the above examination, I 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:



Sl. No.	Compliance Requirement(Regulations/Circulars/ guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	Regulation 34 of SEBI(LODR)	Late Submission of Annual Report for the year ended March, 2019.	The Company had submitted the Annual Report to the stock exchange after the delay of 4 days and paid the penalty imposed by the stock Exchange.
1.	Regulation 33(3)(d) of SEBI(LODR)	The unaudited financial statement/ Result for the quarterly and half yearly ended September 30 th , 2019 were submitted to stock exchange after a delay of 7 days.	The unaudited financial statement/ Result for the quarterly and half yearly ended September 30 th , 2019 were submitted to stock exchange after a delay of 7 days against the specified period as required under the Regulation 33(3)(d) of SEBI(LODR). In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company.

(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 my/our examination of those records.

(c) The following are the details of actions taken against the listed entity/ its 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:


S. 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	BSE Limited	Regulation 34 of SEBI(LODR) Regulations, 2015 regarding delay in filling of Annual Report for the year ended March 31 st , 2019.	Fine of Rupees 9,440/- was imposed on the Company.	The Company had paid the fine of Rs. 9,440/- included with applicable GST to the BSE Limited on October 17 th , 2019.
2	BSE Limited	Non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 regarding delay in submission of financial statement/result quarter / half year ended September 30 th , 2019.	Fine of Rs. 41300/- was imposed on the Company.	The Company had paid Rs. 41,300/- included with applicable GST to the BSE December 3 rd 2019.

(d) The 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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NIL	NIL	NIL	NIL

Date- 21.05.2020
Place -New Delhi




Shukti Ojha
Company Secretary in Practice
M.No-10341
C.P. No. 13596

UDIN number F010341B000264111