



INDIAN SUCROSE LIMITED

CIN : L15424PB1990PLC010903
Email Id : info.isl@yaducorporation.com | Website : www.muksug.in



Date: 25.04.2022

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

Ref.: Scrip Code: - 500319

SUBJECT- REVISED ANNUAL SECRETARIAL COMPLIANCE REPORT OF THE COMPANY FOR THE YEAR ENDED MARCH 31ST, 2022

Dear Sir/Madam,

In terms of Clause 3(b) of the SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019 Company filled Annual Secretarial Compliance Report on Saturday, 16th April, 2022 vide acknowledgement number 3925770 but in the report Auditor inadvertently forgot to mention Section D of the report i.e. actions to comply with the observation made in the previous year.

Please find enclosed the Revised Annual Secretarial Compliance Report of the Company for the year ended March 31, 2022, issued by Ms. Shukti Ojha Pandit, Practicing Company Secretary.

We request you to kindly take the above on record and consider this report for future reference.

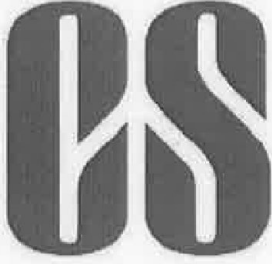
Thanking you,

Yours faithfully,

For Indian Sucrose Limited


Anamika Raju
Company Secretary





SHUKTI OJHA

COMPANY SECRETARY

C-364 (Basement), Vikaspuri,

New Delhi - 110018

9650845885, 011-45733115

csshuktiojha@gmail.com

Date:22/04/2022

To,

BSE Limited

25th Floor, P.J. Towers

Dalal Street Fort Mumbai-400001

I, Shukti Ojha, Practicing Company Secretary, 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 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) 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;

(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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 Requirements (Regulations/Circulars/guidelines including specific clauses)	Deviations	Observations/Remarks of the Practicing Company Secretary
1	Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015	Late submission of standalone impact on Audit qualification for F.Y. ended March 31 st , 2021.	<p>The Impact on Audit qualification for FY ended March 31st, 2021 were submitted to stock exchange on 01st July, 2021 after a delay of 1 day against the specified period as required under Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015 further extended vide SEBI Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556/ dated April 29, 2021</p> <p>In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.</p>



				dated January 22, 2020 read with SEBI SOP Circular
2	BSE Limited	Non-compliance of Regulation 17(2A) of SEBI (LODR) Regulations, 2015 regarding pertaining to quorum of Board Meeting held during the quarter March 31 st ,2021.	Fine of Rupees 11,800/- was imposed on the Company.	The Company had informed the exchange through mail dated May 17 th 2021, that the Board Meeting was automatically stands adjourned due to lack of quorum on 20 th February, 2021 as per the provisions of Section 174 (4) of the Companies Act, 2013 and the company had intimated the exchange regarding this on February 13 th , 2021 and requested the exchange to waive off the imposed penalty.
3	BSE Limited	The observation noted in corporate governance report for Maximum Gap between any two consecutive Audit Committee meetings in number of days	The Company had written a mail for rectifying such discrepancy in previous Corporate Governance report for the quarter	The Company had filed the revised Corporate Governance report in XBRL vide Acknowledgement No. 2901202202554727



			<p>33(3)(d) of SEBI (LODR) Regulations, 2015.</p> <p>In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR /P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.</p>
4.	Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015	Delay in submission of unaudited financial statement/ Results for the quarterly ended December 31 st , 2021.	<p>The unaudited financial statement/ Results for the quarterly ended December 31st, 2021 were submitted to stock exchange on 28th February, 2022 after a delay of 14 days against the specified period as required under the Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015.</p> <p>In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company within the stipulated time period as</p>



			prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.
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(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 or 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	Non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 regarding delay in submission of standalone impact on Audit qualification for the quarter/year ended 31 st March, 2021.	Fine of Rupees 5,900/- was imposed on the Company.	The Company had paid the fine of Rs. 5,900/- included with applicable GST to the BSE Limited within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CM D/CIR/P/2020/12



2	Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015	Delay in submission of unaudited financial statement/Result for the quarterly ended June 30 th , 2021.	<p>The unaudited financial statement/ Result for the quarterly ended June 30th, 2021 were submitted to stock exchange on 31st August, 2021 after a delay of 17 days against the specified period as required under Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015.</p> <p>In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR /P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.</p>
3	Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015	Delay in submission of unaudited financial statement/ Results for the half year ended September 30 th , 2021.	<p>The unaudited financial statement/ Result for the half year ended September 30th, 2021 were submitted to stock exchange on 20th November, 2021, after a delay of 6 days against the specified period as required under Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015.</p>



		not mentioned and requested to immediately upload the rectified XBRL.	ended December 31,2021.	dated 29 th day of January, 2022 and informed the BSE in same day through mail.
4	BSE Limited	Non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 regarding delay in submission of financial statement/results for the quarter ended 30 th June,2021.	Fine of Rupees 88,500/- was imposed on the Company.	The Company had paid the fine of Rs. 88,500/- included with applicable GST to the BSE Limited within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CM D/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular
5	BSE Limited	Non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 regarding delay in submission of financial statement/results for the quarter ended September 30 th , 2021.	Fine of Rupees 29,500/- was imposed on the Company.	The Company had paid the fine of Rs. 29,500/- included with applicable GST to the BSE Limited within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CM D/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular



6	BSE Limited	Non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 regarding delay in submission of financial statement/results for the quarter ended December 31 st , 2021.	Fine of Rs. 82,600/- was imposed on the Company.	The Company had paid Rs. 82,600/- included with applicable GST to the BSE Limited within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CM D/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Compliance Requirement (Requirements /Circulars/Guidelines including specific clauses)	Observations made in the secretarial compliance report for the year ended 31.03.2021	Action taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	Regulation 33(3)(d) of SEBI(LODR)	The unaudited financial statement/ Result for the quarterly and half yearly ended September 30th, 2020 were submitted to stock exchange after a	Board discuss the matter in the Board Meeting and consider the same and affirms that	Acknowledged



		<p>delay of 29 days against the specified period as required under the Regulation 33(3)(d) of SEBI(LODR).</p> <p>In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company.</p>	<p>compliance of the provision is not mens rea on the part of the Company and it were not intentional rather it was circumstantial. In future Company will take extra precaution.</p>	
	<p>Regulation 33(3)(d) of SEBI(LODR)</p>	<p>The unaudited financial statement/ Result for the quarterly ended December 31st,2020 were submitted to stock exchange after a delay of 5 days against the specified period as required under the Regulation 33(3)(d) of SEBI(LODR).</p> <p>In respect thereto, penalty for non-compliance as imposed by the stock exchange was</p>	<p>Board discuss the matter in the Board Meeting and consider the same and affirms that non-compliance of the provision is not mens rea on the part of the Company and it were not intentional rather it was circumstanti</p>	<p>Acknowledged</p>



		paid by the Company.	al. In future Company will take extra precaution.	
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SHUKTI OJHA
(Company Secretary)
M. No. 10341
C.P. No. 13596

UDIN: F010341D000185901

Date: 22/04/2022

Place- Delhi