



# INDIAN SUCROSE LIMITED

G.T.Road, Mukerian - 144 211 Distt. Hoshiarpur, (Punjab) India Fax: +91-1883-244532  
EPABX No. +91+9115110651/52 e-mail : info.isl@yaducorporation.com  
CIN - L15424PB1990PLC010903 ram.chand@yaducorporation.com



Date: 12.04.2021

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 31<sup>ST</sup>, 2021**

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, 2021, 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 - 110018  
9650845885, 011-45733115  
csshuktiojha@gmail.com

ANNUAL SECRETARIAL COMPLIANCE REPORT UNDER REGULATION 24A OF THE  
SEBI (LODR) REGULATIONS, 2015, FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021

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

a) all the documents and records made available to us and explanation provided by the management of 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 **31<sup>st</sup> March, 2021 ("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 33(3)(d) of SEBI(LODR)	The unaudited financial statement/ Result for the quarterly and half yearly ended September 30 <sup>th</sup> , 2020 were submitted to stock exchange on 14 <sup>th</sup> December, 2020	The unaudited financial statement/ Result for the quarterly and half yearly ended September 30 <sup>th</sup> , 2020 were submitted to stock exchange after a delay of 29 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.
2.	Regulation 33(3)(d) of SEBI(LODR)	The unaudited financial statement/ Result for the quarterly ended December 31 <sup>st</sup> , 2020 were submitted to stock exchange on 20 <sup>th</sup> February, 2021	The unaudited financial statement/ Result for the quarterly ended December 31 <sup>st</sup> , 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).  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 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	Fine of Rupees 1,35,000/- was imposed on the Company.	The Company had paid the fine of Rs. 1,59,300/- included with applicable GST to



		submission of financial statement/result quarter / half year ended September 30 <sup>th</sup> , 2019		the BSE Limited on 15.12.2020
2	BSE Limited	Non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 regarding delay in submission of financial statement/result quarter ended December 30 <sup>th</sup> , 2020	Fine of Rs. 25,000/- was imposed on the Company.	The Company had paid Rs. 29,500/- included with applicable GST to the BSE Limited on 17.03.2021

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

Sr. No	Compliance Requirement( Requirements/Circulars/Guidelines including specific clauses)	Observations made in the secretarial compliance report for the year ended - ... (The years are to be mentioned)	Action taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NIL	NIL	NIL	NIL



Date- 09/04/2021  
Place- New Delhi

*Shukti Ojha*  
Shukti Ojha  
Company Secretary in Practice  
M.No.36120  
UDIN: F010341C000040250