AMIT GUPTA & ASSOCIATES





Annual Secretarial Compliance Report of Simbhaoli Sugars Limited for the financial year ended on 31st March, 2024

[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,

Simbhaoli Sugars Limited,

(CIN - L15122UP2011PLC044210)

Simbhaoli-245207, District Hapur Uttar Pradesh

In terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), we have been appointed vide the Resolution passed by the Board of Directors of Simbhaoli Sugars Limited (hereinafter referred as "the listed entity"), having its Registered Office at Simbhaoli-245207, District Hapur Uttar Pradesh in their meeting held on May 26, 2023, to make Secretarial Review and issue Annual Secretarial Compliance Report ("Report") for the the review period covering the financial year ended at March 31, 2024 ("Review Period").

A. BACKGROUND

We have conducted the review of the compliance with the applicable statutory provisions and the adherence to good corporate practices by Simbhaoli Sugars Limited (hereinafter referred to as "the listed entity"), having its Registered Office at Simbhaoli-245207, District Hapur Uttar Pradesh. The Secretarial Review was conducted in a manner that provided us with a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period, complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

B. VERIFICATION

- I. We have examined:
- a) all the documents and records made available to us and explanation provided by the listed entity;
- b) the filings/ submissions made by the listed entity to the stock exchanges;

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- c) website of the listed entity;
- d) other documents, records, filings/submissions, made with other Regulators, to the extent considered relevant to make this certification;

for the year ended on March 31, 2024 ("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, and guidelines issued thereunder; and
- the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, and guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");
- II. 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 ("Listing Regulations");
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 ("ICDR Regulations");
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("Takeover Regulations");
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 ("Buyback Regulations") (Not applicable to the listed entity during the review period);
- e) The Securities and Exchange Board of India (Share Based Employee Benefits & Sweat Equity) Regulations, Regulations 2021 ("SBEB Regulations") (Not applicable to the listed entity during the review period);
- f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2021 ("Non-Convertible Securities Regulations") (Not applicable to the listed entity during the review period);
- g) The Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 ("Delisting Regulations") (Not applicable as the listed entity has not made any delisting during the year under report);
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations");
- i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 ("RTA Regulations") regarding the Companies and dealing with clients Not applicable as the listed entity is not registered as Registrar to Issue and Share Transfer Agent during the financial year under review;
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 ("DP Regulations");

C. REPORTING

Based on the above examination, we hereby report that during the Review Period:

- The status of compliance with the provisions of the Regulations, as indicated above in para (B) of this Report and circulars/ guidelines issued thereunder by the listed entity is as per **Statement – I**, attached herewith;
- II. The status of the actions taken by the listed entity to comply with the observations, if any, made in



- previous reports, is as per **Statement II**, attached herewith;
- III. The status of compliances related to the resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October 2019, is as per **Statement III**, attached herewith;
- IV. The status of other compliances on additional matters as per circular no. 20230316-14 dated March 16, 2023, read with circular no. 20230410-41 dated April 10, 2023, issued by BSE Limited ("BSE") and circular no. NSE/CML/2023/21 dated March 16, 2023, read with circular no. NSE/CML/2023/30 dated April 10, 2023, issued by National Stock Exchange Limited ("NSE"), is as per Statement IV, attached herewith.

D. ASSUMPTIONS & LIMITATION OF SCOPE AND REVIEW

- Maintenance of the secretarial record is the responsibility of the management of the listed entity. Our responsibility is to present the status of these secretarial records based on our review.
- II. We have followed the practices and processes as were considered appropriate to obtain reasonable assurance regarding compliance and correctness of the contents of the secretarial records. The verification was done on a reasonable basis to ensure that the correct facts are reflected in the report. We believe that the processes and practices, we followed, provide a reasonable basis for our report.
- III. Compliance with the applicable laws and ensuring the authenticity of documents and information furnished are the responsibilities of the management of the listed entity.
- IV. Our responsibility is to report based on our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- V. We have not verified the correctness and appropriateness of the financial Records and Books of Accounts of the listed entity, except to the extent considered necessary for this report.
- VI. Wherever required, we have obtained the management representation about the compliance of laws, rules, and regulations and the happening of events, etc.
- VII. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the Listing Regulations and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Amit Gupta & Associates

Company Secretaries

Amit Gupta

Practising Company Secretary



Membership No.: F5478

C.P. No.: 4682

PR. No.: 2600/2022

UDIN - F005478F000503261

Date: May 30, 2024 Place: Lucknow



Statement - I

Status of compliance with the provisions of the Regulations indicated as indicated above in para (B) of this Report and circulars/guidelines issued thereunder

The listed entity has complied with the provisions of the Regulations as indicated above in para (B) of this Report and circulars/ guidelines issued thereunder, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulati on/ Circular No.	Deviations	Act ion Tak en by	Type of Action - Advisory/ Clarificati on/ Fine/Sho w Cause Notice/ Warning, etc.	Details of Violation	of	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Manageme nt Response	Remarks
1)	The audit committee of the listed entity to also review the financial statements, in particular, the investments	Regulatio n 24(2) of the Listing Regulatio ns	No review of annual audited financial statements in respect of one of its material subsidiary	Nil	Nil	Delay in review of annual audited financial statements in respect o one of its material		Nil	The audit committee has reviewed the annual audited financial statements in respect of one of its material subsidiary –	The Managemen t informed that the financial results of SPPL for three quarters	The observation is persisting since March 2019.

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	made by the		– Simbhaoli			subsidiary –		SPPL for year	have not	
	enlisted		Powers			SPPL for		ended at	been	
	subsidiary.		Private			year ended		March 2023	finalised and	
	,		Limited			at March		with delay and	approved	
			("SPPL")			2023 and no		has not	within the	
			for year			review for		reviewed the	period	
			ended at			the		quarterly	prescribed	
			March			quarterly		financial results	under the	
			2023 and			financial		for the quarter	Listing	
			for the			results for		ended on 30th	Regulations	
			quarterly			the quarter		June 2023,	and the	
			financial			ended on		30th Sept 2023	financial	
			results for			30th June		and 31st	results of	
			the quarter			2023, 30th		December	SPPL for the	
			ended on			Sept 2023		2023.	year ended	
			30th June			and 31st			on 31st	
			2023, 30th			December			March 2023	
			Sept 2023			2023.			were	
			and 31st						finalised and	
			December						approved	
			2023.						beyond the	
									prescribed	
									period	
									under the	
									Listing	
									Regulations.	
2)	Submission of	Regulatio	Non	Nil	Nil	Non	Nil	In the	The	The observation
	quarterly/year	n	consolidati			consolidatio		consolidated	Managemen	is persisting
	-to-date	33(3)(b)	on of the			n of the		financial results	t informed	since March
	consolidated	of the	financial			financial		(limited	that the	2019.
	financial	Listing	results of			results of		reviewed) of	quarterly	
	results by the	Regulatio	SPPL, a			SPPL, a		the Company	financial	
				<u> </u>						



listed entities	ns	material	material	for the quarter	results of
having		subsidiary,	subsidiary,	ended 30th	SPPL have
subsidiaries		in the	in the	June, 2023;	yet not been
		financial	financial	30th Sept,	finalised and
		results	results	2023 and 31st	approved as
		(Audited)	(Audited) of	Dec, 2023, the	per the
		of listed	listed entity	financial results	Listing
		entity for	for the year	of SPPL, a	Regulations.
		the year	ended at	material	
		ended at	31st March,	subsidiary have	
		31st	2023 and in	not been	
		March,	financial	consolidated.	
		2023 and in	results	Further, in the	
		financial	(limited	consolidated	
		results	reviewed) of	financial results	
		(limited	the listed	(Audited) for	
		reviewed)	entity for	the year ended	
		of the	the quarter	at 31st March,	
		listed	ended 30th	2023, the	
		entity for	June, 2023;	financial results	
		the quarter	30th Sept,	of SPPL, a	
		ended 30th	2023 and	material	
		June, 2023;	31st Dec,	subsidiary have	
		30th Sept,	2023.	not been	
		2023 and		consolidated.	
		31st Dec,			
		2023.			



3)	Prior	Regulatio	Prior	Yes	SOP Fine	Delay of one	11800	Delay of one	The	SOP fine levied
	Intimation to	n 29(2)	intimation			day in prior	by each	day in prior	Company	vide letter dated
	Stock	of the	was short			intimation	exchang	intimation for	has given	December 14,
	Exchange	Listing	by one day			for	е	convening of	prior	2023 has been
	regarding	Regulatio	in respect			convening		Board Meeting	intimation	deposited by
	Board Meeting	ns	of Board			of Board		held on	on	the Company
			meeting			Meeting		November 07,	November	
			held on			held on		2023	02, 2023	
			November			November			and a delay	
			07, 2023			07, 2023			of one day	
									was	
									inadvertent	
4)	Payment of	Regulatio	The	No	Nil	The	Nil	The Company	The	The
	Managerial	n	Company			Company		has made	Company is	observations
	Remuneration	17(6)(d)	paid			paid		payment of	actively	made are self
		of the	remunerati			remuneratio		managerial	pursuing	explanatory
		Listing	on for two			n for two		remuneration	with the	
		Regulatio	years to			years to the		in deviation to	remaining	
		ns	the			Managing		the provisions	lenders to	
			Managing			Director,		of Section 197	provide	
			Director,			Mrs		read with	their	
			Mrs			Gursimran		Schedule V of	consent	
			Gursimran			Kaur Mann		the Companies	and, after	
			Kaur Mann			and Whole-		Act, 2013.	receipt	
			and Whole-			Time			thereof, the	
			Time			Director,			payment of	
			Director,			Mr. S.N.			aforesaid	
			Mr. S.N.			Misra,			remuneratio	
			Misra,			aggregating			n	
			aggregating			to INR			will be in full	
			to INR			301.82			compliance	
			301.82			Lakhs in the			with the	



	Lakhs in	current and	provisions
	the current	earlier	of the
	and earlier	financial	Companies
	financial		Act.
		years, as per the	Act.
	years, as	1 1	
	per the	terms of	
	terms of	Special	
	Special	Resolutions	
	Resolutions	passed at	
	passed at	the 10th	
	the 10th	Annual	
	Annual	General	
	General	Meeting	
	Meeting	(AGM) held	
	(AGM) held	on	
	on	September	
	September	27, 2021.	
	27, 2021.	Lenders	
	Lenders	with a	
	with a	majority	
	majority	share in the	
	share in	outstanding	
	the	debts, led	
	outstandin	by the State	
	g debts, led	Bank of	
	by the	India, have	
	State Bank	provided	
	of India,	their	
	have	consent	
	provided	to pay the	
	their	aforesaid	
	consent	remuneratio	
	to pay the	n but	
	to pay the	11 000	



aforesaid	consent	
remunerati	from some	
on but	lenders is	
consent	still awaited.	
from some		
lenders is		
still		
awaited.		



Statement - II

Detail of actions taken by the listed entity on Non-compliance with the provisions of the Regulations as indicated above in para (B) of this Report and circulars/ guidelines issued thereunder, as mentioned in the Report of the previous year(s)

The details of actions taken by the listed entity on Non-compliance with the provisions of the Regulations as indicated above in para (B) of this Report and circulars/ guidelines issued thereunder, as mentioned in the Report of the previous year(s) are as under:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulati on/ Circular No.	Deviations	Actio n Take n by	Type of Action - Advisory/ Clarificati on/ Fine/Sho w Cause Notice/ Warning, etc.	Details of Violation	Fine Amou nt (INR includ ing GST)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1)	The audit committee of the listed entity to also review the financial statements, in particular, the investments made by the unlisted subsidiary.	Regulatio n 24(2) of the Listing Regulatio ns	Delay in review of annual audited financial statements in respect of one of its material subsidiary – SPPL for year ended at March	Nil	Nil	Delay in review of annual audited financial statements in respect of one of its material subsidiary – SPPL for year ended at March	Nil	The audit committee has reviewed the annual audited financial statements in respect of one of its material subsidiary – SPPL for year ended at March 2021 with delay and	The Management informed that the financial results of SPPL for three quarters have not been finalised and approved	The review of annual audited financial statements in respect of one of its material subsidiary — SPPL for year ended at March 2021 has already been done by Audit



			2021 and			2021 and no		has not	within the	Committee,
			no review			review for		reviewed the	period	however
			for the			the		quarterly	prescribed	review of the
			quarterly			quarterly		financial results	under the	quarterly
			financial			financial		for the quarter	Listing	financial results
			results for			results for		ended on 30th	Regulations	for the quarter
			the quarter			the quarter		June 2021,	and the	ended on 30th
			ended on			ended on		30th Sept 2021	financial	June 2021,
			30th June			30th June		and 31st	results of	30th Sept 2021
			2021, 30th			2021, 30th		December	SPPL for the	and 31st
			Sept 2021			Sept 2021		2021.	year ended	December
			and 31st			and 31st			on 31st	2021 is still
			December			December			March 2021	pending.
			2021.			2021.			were	
									finalised and	The
									approved	observation is
									beyond the	persisting since
									prescribed	March 2019.
									period under	
									the Listing	
									Regulations.	
2)	Submission of	Regulatio	Non	Nil	Nil	Non	Nil	In the	The	The
	quarterly/year	n	consolidati			consolidatio		consolidated	Management	consolidated
	-to-date	33(3)(b)	on of the			n of the		financial results	informed	annual audited
	consolidated	of the	financial			financial		(limited	that the	financial
	financial	Listing	results of			results of		reviewed) of	quarterly	statements in
	results by the	Regulatio	SPPL, a			SPPL, a		the Company	financial	respect of one
	listed entities	ns	material			material		for the quarter	results of	of its material
	having		subsidiary,			subsidiary,		ended 30th	SPPL have	subsidiary –
	subsidiaries		in the			in the		June, 2021;	yet not been	SPPL for year
			financial			financial		30th Sept,	finalised and	ended at
			results			results		2021 and 31st	approved as	March 2021



	(limited	(limited	Dec, 2021, the	per the	has already
	reviewed)	reviewed) of	financial results	Listing	been
	of the	the listed	of SPPL, a	Regulations.	submitted with
	listed	entity for	material		delay on
	entity for	the quarter	subsidiary have		February 12,
	the quarter	ended 30th	not been		2022 in the
	ended 30th	June, 2021;	consolidated.		financial results
	June, 2021;	30th Sept,	Further, in the		for quarter
	30th Sept,	2021 and	consolidated		ended at 31st
	2021 and	31st Dec,	financial results		Dec, 2021,
	31st Dec,	2021 and	(Audited) for		however
	2021 and	delay in	the year ended		submission of
	delay in	submission	at 31st March,		the quarterly
	submission	of the	2021, the		consolidated
	of the	consolidate	financial results		financial results
	consolidate	d financial	of SPPL, a		for the quarter
	d financial	results	material		ended on 30th
	results	(Audited)	subsidiary have		June 2021,
	(Audited)	for the year	been		30th Sept 2021
	for the year	ended at	consolidated		and 31st
	ended at	31st March,	with delay on		December
	31st	2021, on	February 12,		2021 is still
	March,	February 12,	2022 in the		pending.
	2021, on	2022 in the	financial results		
	February	financial	for quarter		
	12, 2022 in	results for	ended at 31st		
	the	quarter	Dec, 2021.		
	financial	ended at			
	results for	31st Dec,			
	quarter	2021.			
	ended at				
	31st Dec,				
	2021.				



3)	The audit	Regulatio	Delay in	Nil	Nil	Delay in	Nil	The audit	The	The review of
'	committee of	n 24(2)	review of			review of		committee has	Management	annual audited
	the listed	of the	annual			annual		reviewed the	informed	financial
	entity to also	Listing	audited			audited		annual audited	that the	statements in
	review the	Regulatio	financial			financial		financial	financial	respect of one
	financial	ns	statements			statements		statements in	results of	of its material
	statements, in		in respect			in respect of		respect of one	SPPL for	subsidiary –
	particular, the		of one of			one of its		of its material	three	SPPL for year
	investments		its material			material		subsidiary –	quarters	ended at
	made by the		subsidiary			subsidiary –		SPPL for year	have not	March 2022
	unlisted		SPPL for			SPPL for		ended at	been	has already
	subsidiary.		year ended			year ended		March 2022	finalised and	been done by
			at March			at March		with delay and	approved	Audit
			2022 and			2022 and no		has not	within the	Committee,
			no review			review for		reviewed the	period	however
			for the			the		quarterly	prescribed	review of the
			quarterly			quarterly		financial results	under the	quarterly
			financial			financial		for the quarter	Listing	financial results
			results for			results for		ended on 30th	Regulations	for the quarter
			the quarter			the quarter		June 2022,	and the	ended on 30th
			ended on			ended on		30th Sept 2022	financial	June 2022,
			30th June			30th June		and 31st	results of	30th Sept 2022
			2022, 30th			2022, 30th		December	SPPL for the	and 31st
			Sept 2022			Sept 2022		2022.	year ended	December
			and 31st			and 31st			on 31st	2022 is still
			December			December			March 2022	pending.
			2022.			2022.			were	
									finalised and	The
									approved	observation is
									beyond the	persisting since
									prescribed	March 2019.
									period under	
									the Listing	



									Regulations.	
4)	Submission of	Regulatio	Non	Nil	Nil	Non	Nil	In the	The	The
	quarterly/year	n	consolidati			consolidatio		consolidated	Management	consolidated
	-to-date	33(3)(b)	on of the			n of the		financial results	informed	annual audited
	consolidated	of the	financial			financial		(limited	that the	financial
	financial	Listing	results of			results of		reviewed) of	quarterly	statements in
	results by the	Regulatio	SPPL, a			SPPL, a		the Company	financial	respect of one
	listed entities	ns	material			material		for the quarter	results of	of its material
	having		subsidiary,			subsidiary,		ended 30th	SPPL have	subsidiary –
	subsidiaries		in the			in the		June, 2022;	yet not been	SPPL for year
			financial			financial		30th Sept,	finalised and	ended at
			results			results		2022 and 31st	approved as	March 2022
			(limited			(limited		Dec, 2022, the	per the	has already
			reviewed)			reviewed) of		financial results	Listing	been
			of the			the listed		of SPPL, a	Regulations.	submitted with
			listed			entity for		material		delay on
			entity for			the quarter		subsidiary have		February 13,
			the quarter			ended 30th		not been		2023 in the
			ended 30th			June, 2022;		consolidated.		financial results
			June, 2022;			30th Sept,		Further, in the		for quarter
			30th Sept,			2022 and		consolidated		ended at 31st
			2022 and			31st Dec,		financial results		Dec, 2022,
			31st Dec,			2022 and		(Audited) for		however
			2022 and			delay in		the year ended		submission of
			delay in			submission		at 31st March,		the quarterly
			submission			of the		2022, the		consolidated
			of the			consolidate		financial results		financial results



consolidate	d financial	of SPPL, a	for the quarter
d financial	results	material	ended on 30th
results	(Audited)	subsidiary have	June 2022,
(Audited)	for the year	been	30th Sept 2022
for the year	ended at	consolidated	and 31st
ended at	31st March,	with delay on	December
31st	2022, on	February 13,	2022 is still
March,	February 13,	2023 in the	pending.
2022, on	2023 in the	financial results	
February	financial	for quarter	
13, 2023 in	results for	ended at 31st	
the	quarter	Dec, 2022.	
financial	ended at		
results for	31st Dec,		
quarter	2022.		
ended at			
31st Dec,			
2022.			



Statement - III

Status of compliances related to the resignation of statutory auditors from the listed entity and its material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October 2019

The status of compliance with circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019, by the listed entity and its material subsidiaries in respect of appointment/ re-appointment/ resignation of statutory auditor during the Review Period, is as under:

Sr.	Particulars	Compliance	Observations/
No.		Status	Remarks by PCS*
		(Yes/No/ NA)	
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	a) If the auditor has resigned within 45 days from the end of a quarter of a	NA	No instance of
	financial year, the auditor before such resignation, has issued the limited		appointment of Auditor
	review/ audit report for such quarter; or		in the listed entity and
	b) If the auditor has resigned after 45 days from the end of a quarter of a financial		its material subsidiary
	year, the auditor before such resignation, has issued the limited review/ audit		noted during the Review
	report for such quarter as well as the next quarter; or		Period.
	c) If the auditor has signed the limited review/ audit report for the first three		
	quarters of a financial year, the auditor before such resignation, has issued the		
	limited review/ audit report for the last quarter of such financial year as well as		
	the audit report for such financial year.		
2.	Other conditions relating to resignation of statutory auditor	I	



a) Reporting of concerns by Auditor with respect to the listed entity/its	N/A	No instance of
material subsidiary to the Audit Committee:		resignation of Auditor in
		the listed entity and its
		material subsidiary
		noted during the Review
		Period.
(i) In case of any concern with the management of the listed	N/A	No instance of
entity/material subsidiary such as non-availability of information /		resignation of Auditor in
non- cooperation by the management which has hampered the audit		the listed entity and its
process, the auditor has approached the Chairman of the Audit		material subsidiary
Committee of the listed entity and the Audit Committee shall receive		noted during the Review
such concern directly and immediately without specifically waiting for		Period.
the quarterly Audit Committee meetings.		
(ii) In case the auditor proposes to resign, all concerns with respect to		
the proposed resignation, along with relevant documents has been		
brought to the notice of the Audit Committee. In cases where the		
proposed resignation is due to non-receipt of information /		
explanation from the company, the auditor has informed the Audit		
Committee the details of information/ explanation sought and not		
provided by the management, as applicable.		
(iii) The Audit Committee / Board of Directors, as the case may be,		



	deliberated on the matter on receipt of such information from the		
	auditor relating to the proposal to resign as mentioned above and		
	communicate its views to the management and the auditor.		
	b) Disclaimer in case of non-receipt of information:		
	(i) The auditor has provided an appropriate disclaimer in its audit report,		
	which is in accordance with the Standards of Auditing as specified by		
	ICAI / NFRA, in case where the listed entity/ its material subsidiary has		
	not provided information as required by the auditor.		
3.	The listed entity / its material subsidiary has obtained information from the	NA	No instance of
	Auditor upon resignation, in the format as specified in Annexure-A in SEBI Circular		resignation of Auditor in
	CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.		the listed entity and its
			material subsidiary
			noted during the Review
			Period.

^{*}Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'



Statement - IV

Status of other compliances on additional matters as per circular no. 20230316-14 dated March 16, 2023, read with circular no. 20230410-41 dated April 10, 2023 issued by BSE Limited and circular no. NSE/CML/2023/21 dated March 16, 2023, read with circular no. NSE/CML/2023/30 dated April 10, 2023, issued by National Stock Exchange Limited

The status of other compliances on additional matters as per circular no. 20230316-14 dated March 16, 2023 read with circular no. 20230410-41 dated April 10, 2023, issued by BSE Limited and circular no. NSE/CML/2023/21 dated March 16, 2023 read with circular no. NSE/CML/2023/30 dated April 10, 2023, issued by National Stock Exchange Limited, is as under:

Sr. No.	Particulars	Compliance Status Yes/No/NA	Observations/ Remarks by PCS*
1)	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	No comments required
2)	Adoption and timely updation of the Policies: a) All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities;	Yes	No comments required
	b) All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines	Yes	No comments required



	issued by SEBI.		
3)	Maintenance and disclosures on Website: a) The Listed entity is maintaining a functional website;	Yes	No comments required
	b) Timely dissemination of the documents/ information under a separate section on the website;	Yes	No comments required
	c) Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/section of the website.	Yes	No comments required
4)	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013, as confirmed by the listed entity.	Yes	No comments required
5)	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies;	Yes	No comments required
	(b) Disclosure requirement of material as well as other subsidiaries.	Yes, subject to our comment in	Please refer our observations regarding compliance of the provisions of the regulation 24(2) of the Listing Regulations in respect of review of quarterly unaudited financial results for



		net column	the quarter ended at June 2023, September 2023, December 2023 and audited financial results for the quarter and year ended at March 2023 of its unlisted material subsidiary – Simbhaoli Power Private Limited
6)	Preservation of Documents:	Yes	No comments required
	The listed entity 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		
	Regulations, 2015.		
7)	Performance Evaluation:	Yes	No comments required
	The listed entity has conducted performance		
	evaluation of the Board, Independent Directors and the		
	Committees at the start of every financial year/during		
	the financial year as prescribed in SEBI Regulations.		
8)	Related Party Transactions:	Yes	No comments required
	(a) The listed entity has obtained prior approval of Audit		
	Committee for all related party transactions; or		



	(b) The listed entity has provided detailed reasons	Yes	No comments required
	along with confirmation whether the transactions		
	were subsequently approved/ratified/rejected by		
	the Audit Committee, in case no prior approval		
	has been obtained.		
9)	Disclosure of events or information:	Yes	No comments required
	The listed entity has provided all the required		
	disclosure(s) under Regulation 30 along with Schedule		
	III of SEBI LODR Regulations, 2015 within the time limits		
	prescribed thereunder.		
10)	Prohibition of Insider Trading:	Yes	No comments required
	The listed entity is in compliance with Regulation 3(5) &		
	3(6) SEBI (Prohibition of Insider Trading) Regulations,		
	2015.		
11)	Actions taken by SEBI or Stock Exchange(s), if any:	Yes	No comments required
	No action(s) has been taken against the listed entity/		
	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 except as provided in the		



	Statement – I, attached with this report.		
12)	Additional Non-compliances, if any:	Yes	No comments required
	No additional non-compliance observed for any SEBI		
	regulation/circular/guidance note etc.		