

30th May, 2023

To
The BSE Limited
Corporate Relationship Department,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai-400001

The Calcutta Stock Exchange Limited
7, Lyons Range,
Kolkata-700 001

Dear Sir,

Sub: Annual Secretarial Compliance Report under regulation 24A of SEBI (LODR) Regulation 2015.

We enclosed the Annual Secretarial Compliance Report of the Company under regulation 24A of SEBI (LODR) Regulation 2015, duly issued by Ms. Meena Chowdhary, Practicing Company Secretary, for the financial year ended March 31, 2023.

This is for your information and records.

Thanking you,

Yours faithfully,
For Shree Hanuman Sugar & Industries Limited



Datta Ram Gill
Director

Encl: As above

MEENA CHOWDHARY

Practicing company secretary
B.com(H),CS

9/3 Nutan Para Road

Liluah,Howrah-711204

Contact.No:8981219475

Email id:meenachowdhary@ymail.com

chowdharymeena7@gmail.com

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**Secretarial compliance report of M/s. Shree Hanuman Sugar &
Industries Ltd. (CIN: L15432WB1932PLC007276)
for the year ended 31st March, 2023**

I, Meena Chowdhary, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. Shree Hanuman Sugar & Industries ltd. (“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, 2023 (“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; **(Not Applicable to the Company during the Review Period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;**(Not Applicable to the Company during the Review Period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;**(Not Applicable to the Company during the Review Period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;**(Not Applicable to the Company during the Review Period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2015 and circulars/ guidelines issued thereunder; **(Not Applicable to the Company during the Review Period)**



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and based on the above examination, I hereby report that, during the Review Period

Additional affirmations in Annual Secretarial Compliance Report (ASCR) in terms of the BSE circular Reference No. 20230410-41 dated: April 10,2023

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 India (ICSI).	Yes	-
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entitiesAll the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes	-
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">The Listed entity is maintaining a functional websiteTimely dissemination of the documents/ information under a separate section on the websiteWeb-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	-
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	-



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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NA	As per information received Company has no subsidiaries. Since this clause will not applicable on the Company
6.	Preservation of Documents: 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.	Yes	-
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	-
8.	Related Party Transactions: (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 along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes	-
9.	Disclosure of events or information: 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.	Yes	-
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-



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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
11.	Actions taken by SEBI or Stock Exchange(s), if any: 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 under separate paragraph herein (**).	No	BSE has imposed fines and freeze the promoters denat account of the Company due to non compliance of SEBI (LODR) Regulation
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	No	Composition of the Board is not as per regulation 17 of SEBI (LODR) Regulation 2015 as Mr. Leonard Carvey Wholetime Director resigned from the board w.e.f 1st March 2023. There are no executive director on the Board of the Company



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(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:

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Submission of quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter, and within sixty days of last quarter	Regulation 33(3) of SEBI (LODR) Regulation 2015	Delay in submission of financial result for quarter and year ended 31st March, 2022 and for quarter ended 30th June 2022	BSE Ltd.	BSE has imposed fine for delay in submission of financial result for quarter and year ended 31st March, 2022 and for quarter ended 30th June 2022. and freeze the promoter demat account of the Company	The Company has submitted financial result delay	Fine imposed Rs. 177000/- for quarter and year ended 31st March 2022 and Rs. 41300/- for quarter ended 30th June 2022 including GST as per email received from BSE Ltd.	As per information received delay in submission of financial result is due to delay in finalization of financial statement for quarter and year ended 31st March 2022 and 30th June 2022	The fine amount of Rs. 177000/- is paid on 29.10.2022 and Rs. 41300/- paid on 21.03.2023. Follow up is going on with BSE for defreeze the promoter's demat account	



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

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/CircularNo.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Submission of the Annual Report within the period prescribed under SEBI (LODR) regulation 2015	Regulation 34(1) of SEBI (LODR) Regulation 2015	Delay in submission of Annual Report for the financial year ended 31st March 2021	BSE Ltd.	BSE has imposed fine for delay in submission of Annual Report for the Financial year ended March 31, 2021.	The Company has submitted Annual Report for the financial year ended 31st March 2021 delay	Rs. 34000/-	As per information received from the Company that delay happened was inadvertent and not intentional, and was during suspension period and company will take care of compliances in future	Company has made waiver request for fine to the BSE Ltd. on the ground that as per SEBI circular SEBI/HO/CFD/CMD/CIR/P/20/12 dated January 22, 2020, page 7 with an asterik mark, and also on Page No 8, Point No C(3) of the BSE Guidance Note on SEBI circular dated January 22, 2020, fine would not imposed during suspension period. We are awaiting reply from BSE for the same.	



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2	Submission of the Disclosure of related party transactions within the period prescribed under this regulation	Regulation 29(9) of SEBI (LODR) Regulation 2015	Delay in submission of Disclosure of related party transactions for the half year ended 30th September 2021	BSE Ltd.	BSE has imposed fine for delay in submission of Annual Report for the Financial year ended March 31, 2021.	The Company has submitted Annual Report for the financial year ended 31st March 2021 delay	Rs. 188800/-	As per information received from the Company that delay happened was inadvertent and not intentional, and was during suspension period and company will take care of compliances in future	Company has made waiver request for fine to the BSE Ltd. on the ground that as per SEBI circular SEBI/HO/CFD/CMD/CIR/P/20/12 dated January 22, 2020, page 7 with an asterisk mark, and also on Page No 8, Point No C(3) of the BSE Guidance Note on SEBI circular dated January 22, 2020, fine would not imposed during suspension period. We are awaiting reply from BSE for the same.
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CS MEENA CHOWDHARY
PROPRIETRESS
MEMBERSHIP NO. 41084

PRACTICING COMPANY SECRETARY
CP NO. 16829

Place: Kolkata
Date: 29/05/2023
UDIN: A041084E000405041

Name : Meena Chowdhary
ACS No.: 41084
C P No.: 16829