

18th May, 2022

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, 2022.

This is for your information and records.

Thanking you,

Yours faithfully,  
For Shree Hanuman Sugar & Industries Limited

  
Lenoard Carvey  
Whole Time Director

Encl: As above

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**Secretarial compliance report of M/s. Shree Hanuman Sugar &  
Industries Ltd. (CIN: L15432WB1932PLC007276)  
for the year ended 31st March, 2022**

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, 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; **(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);**



# MEENA CHOWDHARY

Practicing Company Secretary  
B.COM(H), CS

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- (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;
- (j) 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);**

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, in respect of matters specified below:-
- (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 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 l N o	Actio n 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	Regulation 34 of SEBI (LODR) Regulation 2015	BSE has imposed fine for delay in submission of Annual Report for the Financial year ended March 31, 2021	As per information received from the Company that delay happened was during suspension period and it was inadvertent and not intentional, and company will take care of compliances in future.
2	BSE	Regulation 23(9) of SEBI (LODR) Regulation 2015	BSE has imposed fine for Non- submission of disclosures of related party transactions for half year ended September 30, 2021.	As per information received from the Company that there were no related party transactions during the period for which fine imposed. Non-disclosure was inadvertent and not intentional, and company will take care in future.



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(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 31st March 2022	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Trading approval of the equity shares of the Company is still under process.	The Company should take care of all compliances as per SEBI (LODR) regulation and other regulation as applicable on time	Company was follow up regularly with BSE for granting in-principle approval and final trading approval for revocation of suspension.  BSE has granted in principle approval with email dated 02/08/2021 and final trading approval is effective from 28/10/2021	After making so many efforts company is revoked from suspension and started trading on BSE w.e.f 28/10/2021. The Company should take care of all compliances in future also.

Place: Kolkata  
Date: 18/05/2022

UDIN: A041084D000340328

CS MEENA CHOWDHARY  
PROPRIETRESS  
MEMBERSHIP NO. 11084  
  
PRACTICING COMPANY SECRETARY  
CP NO. 16829