



28<sup>th</sup> May 2024

Listing Department  
**National Stock Exchange of India Limited**  
Exchange Plaza, Bandra Kurla Complex  
Bandra (East), Mumbai – 400 051

Dept. of Corporate Service  
**BSE Limited**  
P. J. Towers, Dalal Street  
Mumbai – 400 001

NSE Symbol: **RENUKA**

BSE Scrip Code: **532670**

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March 2024**

Dear Sir / Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith Annual Secretarial Compliance Report issued by DVD & Associates, Practising Company Secretary (C.P. No. 6515) for the financial year ended 31<sup>st</sup> March 2024.

You are requested to take the above information on record.

Thanking you,

Yours faithfully,  
For **Shree Renuka Sugars Limited**

**Deepak Manerikar**  
Company Secretary

Encl.: as above

**Shree Renuka Sugars Limited**

**Corporate Office:** 7<sup>th</sup> Floor • Devchand House • Shiv Sagar Estate • Dr. Annie Besant Road • Worli Mumbai 400 018 • Maharashtra • India

**P** +91 22 2497 7744/4001 1400 **F** +91 22 2497 7747 **E** info@renukasugars.com

**Registered Office:** 2nd / 3rd Floor, Kanakshree Arcade, CTS No. 10634, JNMC Road, Nehru Nagar, Po: Belagavi- 590 010 • Karnataka • India

**P** +91 831 2404000 **F** +91 831 2404961

**W** www.renukasugars.com • Corporate Identification No.: L01542KA1995PLC019046



**DVD & ASSOCIATES**

Company Secretaries

+ 91 - 9823239397

devendracs@gmail.com

Pune | Mumbai | Kolhapur | Yavatmal | Dubai

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF SHREE RENUKA SUGARS LIMITED FOR  
THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2024.**

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Shree Renuka Sugars Limited (hereinafter referred as 'the listed entity'), having its Registered Office at 2nd and 3rd Floor, Kanakashree Arcade, CTS No. 10634, JNMC Road, Neharu Nagar, Belagavi 590010. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion 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 in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2024 ("review period"), complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, DVD & Associates (PCS), have examined:

- (a) all the documents and records made available to us and explanation provided by SHREE RENUKA SUGARS LIMITED ("the Public Listed Company"). The company is listed at BSE Limited and National Stock Exchange of India Limited.
- (b) the filings/ submissions made by the listed entity to the stock exchanges.
- (c) website of the listed entity is updated as per the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015,
- (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, 2024 ("**Review Period**") in respect of compliance with the provisions of:



- I. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under;
- II. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. (SEBI LODR Regulations)
- (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 during the review period]**;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **[Not applicable during the review period]**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and based on the above examination, we 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 in ANNEXURE A to this report
- b. The listed entity has taken actions to comply with the observations made in previous reports as per ANNEXURE B attached.

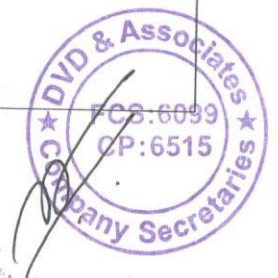
We further affirm on the basis of the information received and examination of various documents as required by the circulars issued by Stock Exchanges:



Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/ Remarks by PCS
1	<u>Secretarial Standards:</u> 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	NA
2	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>• All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/ guidelines issued by SEBI</li> </ul>	Yes	NA
3	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/ information under a separate section on the website</li> <li>• 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</li> </ul>	Yes	NA
4	<u>Disqualification of Director:</u> None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	NA
5	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (There is no material subsidiary of the Company.) (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	NA



6	<p><u>Preservation of Documents:</u></p> <p>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.</p>	Yes	NA
7	<p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees as prescribed in SEBI Regulations.</p>	Yes	NA
8	<p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions.</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee.</p>	Yes	NA
9	<p><u>Disclosure of events or information:</u></p> <p>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.</p>	Yes	NA
10	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	Yes	NA
11	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>	NA	NA



12	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> The Company has received notice from BSE in respect of the specific non compliances and the Company has replied to them satisfactorily. No other actions have 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.	Yes	The details of the notices received and the actions taken are mentioned in ANNEXURE A to this report.
12	<u>Additional non-compliances, if any:</u> No non-compliance observed for all SEBI regulation/circular/guidance note etc.	NA	NA

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- \*3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 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 DVD & ASSOCIATES  
COMPANY SECRETARIES

DEVENDRA DESHPANDE  
FCS No. 6099 CP No. 6515  
PR NO: 1164/2021

Place: Pune  
Date: 25.05.2024  
UDIN: F006099F000449181



**ANNEXURE A**  
**ANNUAL SECRETARIAL COMPLIANCE REPORT OF SHREE RENUKA SUGARS LIMITED**  
**FOR THE FINANCIAL YEAR ENDED ON 31.03.2024**

The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under which are applicable for the Company, 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
01	Regulation 60 (2) SEBI (LODR) Regulations, 2015 The listed entity shall give notice in advance of at least seven working days (excluding the date of intimation and the record date) to the recognised stock exchange(s) of the record date or of as many days as the stock exchange(s) may agree to or	Regulation 60 (2)	2 days	BSE	Fine levied	Delay in furnishing notice.	11800/-	Company paid the penalty amount.	There was an inadvertent delay of 2 days in filing an intimation of record date (Reg. 60(2) of SEBI LODR) for payment of interest/principal obligations of NCDs issued by the Company, for the quarter ended 31st March 2023, with BSE Limited.	The required penalty has been paid by the Company and therefore there is no further action required.

On 2<sup>nd</sup> May 2023, BSE Limited issued a letter to the Company informing delay in intimation and instructed to pay the fine amount of Rs. 11,800 (10,000 + 1800)



require specifying the purpose of the record date.									(GST)). The Company has made payment of Rs. 11,800/- to BSE Limited on 16 <sup>th</sup> May 2023.	
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**FOR DVD & ASSOCIATES-  
COMPANY SECRETARIES**

*[Signature]*  
**DEVENDRA DESHPANDE**

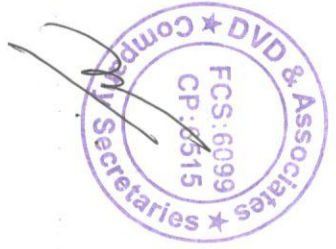
**FCS No. 6099 CP No. 6515**

**PR NO: 1164/2021**

**Place: Pune**

**Date: 25.05.2024**

**UDIN: F006099F000449181**





**ANNEXURE B**

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF SHREE RENUKA SUGARS LIMITED  
FOR THE FINANCIAL YEAR ENDED ON 31.03.2024**

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

Sr. No.	Compliance Requirement	Regulation/ Circular No.	Deviations	Actions taken by the listed entity, if any	Type of Action	Details of Violation	Fine Amount	Observation / Rem	Management Response	Remarks
01	Regulation 60 (2) SEBI (LODR) Regulations, 2015 The listed entity shall give notice in advance of at least seven working days(excluding the date of intimation and the record date) to the recognised stock exchange(s) of the record date or of as many days as the stock	Regulation 60 (2)	2 days	BSE	Fine levied	Delay in furnishing notice.	11800/-	Company paid the penalty amount.	There was an inadvertent delay of 2 days in filing an intimation of record date (Reg. 60(2) of SEBI LODR) for payment of interest/principal obligations of NCDs issued by the	The required penalty has been paid by the Company and therefore there is no further action required.



exchange(s) may agree to or require specifying the purpose of the record date.									<p>Company, for the quarter ended 31st March 2022, with BSE Limited. On 28th September 2022, BSE Limited issued a letter to the Company informing delay in intimation and instructed to pay the fine amount of Rs. 11,800 (10,000 + 1800 (GST)). The Company has made payment of Rs. 11,800/- to BSE Limited on 8th October 2022.</p>



02	Regulation 54 (3) SEBI (LODR) Regulations, 2015 The listed entity shall disclose the security cover available in case of non-convertible debt securities along with its financial results in the format as specified by the Board.	Regulation 54 (3)	15 days	No Action Taken	No Fine levied	Delay in furnishing disclosure.	NA	There was a delay in submission of the Disclosure.	Delay happened due to drastic change in the certificate format by SEBI. The Company has not received any notice for delay and payment of penalty.	Complied with delay of 15 days
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FOR DVD & ASSOCIATES  
COMPANY SECRETARIES

*[Handwritten Signature]*



DEVENDRA DESHPANDE

FCS No. 6099 CP No. 6515

PR NO: 1164/2021

Place: Pune

Date: 25.05.2024

UDIN: F006099F000449181