



May 30, 2022

To,
The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400 001.

Scrp Code: 543267

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2022 under Regulation 24A of SEBI (Listing Obligation & Disclosure Requirements), 2015 read with SEBI circular No. IR/CFD/CMD1/27/2019 dated February 08, 2019.

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligation & Disclosure Requirements), 2015 read with SEBI circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019; we are enclosing herewith Annual Secretarial Compliance Report for the year ended March 31, 2022 issued by M/s. Amit R. Dadheech and Associates, Mumbai.

Kindly take this on your records and acknowledge the same.

Thanking you,

For DAVANGERE SUGAR COMPANY LIMITED



Shamanur Shivashankarappa Ganesh
Managing Director
DIN: 00451383

Factory & Admin Office : Kukkuwada - 577 525, Davangere, Davangere Taluk & District, Karnataka State, INDIA.
Phone : PBX : 08192-201623, 24, 25, 28, 29, 201626 Accounts Direct : 08192-201789 Fax : 08192-201627
E-mail : davangeresugars@gmail.com, accounts@davangeresugars.com, material.dscl@gmail.com
Website : www.davangeresugars.com

Regd. Office : 73/1, P.B. No. 312, Shamanur Road, Davangere - 577 004., Karnataka State, INDIA.
Phone : 08192-222022 to 26 Fax : 08192-222026, E-mail : ssg555@gmail.com

Corporate Office : No. 19, Shivashankar Plaza, 3rd Floor, Richmond Circle, Lalbagh Road, Bengaluru - 560 027., Karnataka State, INDIA.
Phone : 080-22272183 Fax : 080-22227779



**SECRETARIAL COMPLIANCE REPORT OF DAVANGERE SUGAR COMPANY LIMITED FOR
THE FINANCIAL YEAR ENDED MARCH 31, 2022**

To,
Davangere Sugar Company Limited,
73/1, P.B. No. 312,
Shamanur Road,
Davangere,
Karnataka, 577004

We, Amit R. Dadheech & Associates, Practicing Company Secretary, have examined:

- a) all the documents and records made available to us and explanation provided by Davangere Sugar Company 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 March 31, 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; ***(Not Applicable to the Company during the financial year under review)***
- 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 financial year under review)***
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; ***(Not Applicable to the Company during the financial year under review)***
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; ***(Not Applicable to the Company during the financial year under review)***
- 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 financial year under review)***
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,



2015;

and circulars/ guidelines issued thereunder; 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 below:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
		NIL	

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 our 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:

Sr. 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	Regulation 17(1) of SEBI (LODR) Regulations, 2015 Non- Compliance with the requirement pertaining to optimum combination of executive and non-executive directors on the Board of the Company	Penal actions have been taken by the said Stock Exchange such as levy of financial fines and freezing of promoter Demat Accounts for Non-Compliance of the said Regulation For the quarter ended December 2021.	The Company has filed an application for waiver of Fines imposed by the Stock Exchange.

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

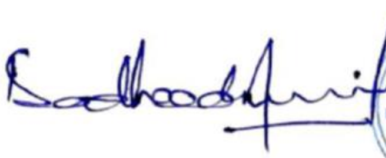

Sr. No	Compliance Requirement (Regulations/ circulars /guidelines including specific clause) of previous year	Action taken	Pending Compliance Requirement (Regulations/ circulars /guidelines including specific clause) of previous year
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Amit R. Dadheech & Associates
Company Secretaries

Not Applicable

.For Amit R. Dadheech & Associates

Amit R. Dadheech

Date: 30.05.2022

UDIN: A022889D000438348

Place: Mumbai