



INDIAN SUCROSE LIMITED

CIN : L15424PB1990PLC010903
Email Id : info.isl@yaducorporation.com | Website : www.muksug.in



Date: 27.05.2024

To
The Manager
The BSE Limited
Department of Corporate Services
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400001.

Ref.: Scrip Code: - 500319

SUBJECT- ANNUAL SECRETARIAL COMPLIANCE REPORT OF THE COMPANY FOR THE YEAR ENDED MARCH 31ST, 2024

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI Master circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated 11 July 2023, we are submitting herewith the Annual Secretarial Compliance Report of the Company for the financial year ended 31 March 2024 duly issued by Ms. Shukti Ojha, Practicing Company Secretary.

We request you to kindly take the above on record.

Thanking you,

Yours faithfully,

For Indian Sucrose Limited

ANAMIKA RAJU Digitally signed by
ANAMIKA RAJU
Date: 2024.05.27
17:51:56 +05'30'

Anamika Raju
Company Secretary



Works and Regd. Office: G.T. Road, Mukerian-144211, Distt Hoshiarpur (Punjab)
Ph.: +91-9115110651/52
Ph.: +91-9115110505, Ph.: +91-9115110663



Shukti Ojha
Company Secretary

**SECRETARIAL COMPLIANCE REPORT OF INDIAN SUCROSE LIMITED
FOR THE FINANCIAL YEAR ENDED 31ST MARCH 2024**

I, Shukti Ojha, Practicing Company Secretary, have examined:

- a) all the documents and records made available to us and explanation provided by **Indian Sucrose 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 **31st March, 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, 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 period under review)



(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the Company during the period under review)

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company during the period 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 period under review).

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

And circulars/guidelines issued thereunder;

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

(1) (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:

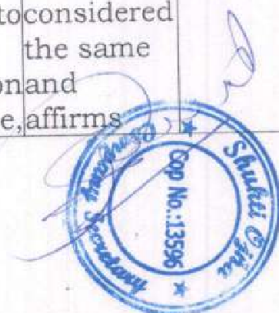
Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation / Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation /Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Disclosure of Related Party Transactions on consolidated basis on the date of publication of its standalon	Regulation 23(9) of SEBI (LODR) Regulations, 2015	Delay in submission of Report	BSE Limited	Fine levied	Non-compliance of Regulation 23(9) of SEBI (LODR) Regulations, 2015 regarding delay in submission	INR 23,600/-	The disclosure of Related Party Transaction for FY ended March 31 st , 2023 were submitted to stock exchange on 19 th June 2023 after	Board discussed the matter in the Board Meeting and considered the same and affirms that non-	Acknowledged



	and consolidated financial results					of disclosure of Related Party Transaction for the half year ended 31 st March, 2023.		delay of 4 days against the specified period required under Regulation 23(9) of SEBI (LODR) Regulations, 2015 extended SEBI Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021. In respect thereto, fine levied for non-compliance by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.	compliance of the provision is not mens rea on the part of the Company and it were not intentional rather it was circumstantial. In future Company will take extra precaution	
2.	Declaration and submission of financial results within 60 days from the end of	Regulation 33 of SEBI (LODR) Regulations, 2015	Delay in submission of Audited financial Result for the year	BSE Limited	Fine levied	Non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015	INR 94,400/-	The Audited financial Result for the year ended March 31 st 2023 submitted to stock	Board discussed the matter in the Board Meeting and considered	Acknowledged



the financial year.		ended March 31st, 2023.			regarding delay in submission of Audited financial results for the year ended 31 st March, 2023.		exchange on the same 15 th June, 2023 after a delay of 16 days against the specified period required under Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015. In respect thereto, penalty for non-compliance imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.	the same and affirms that non-compliance of the provision is not mens rea on the part of the Company and it were not intentional rather it was circumstantial. In future Company will take extra precaution	
3. submission of compliance report on Corporate Governance within 21 days from the end of the quarter.	Regulation 27(2) of SEBI(LODR) Regulations, 2015	Delay in submission of Corporate Governance Report for the year/quarter	BSE Limited	Fine levied	Non-compliance of Regulation 27(2) of SEBI (LODR) Regulations, 2015 regarding delay in	INR 1,29,800/-.	The Corporate Governance Report for the year/quarter ended March 31 st , 2023 were submitted to stock exchange on 16 th June,	Board discussed the matter in the Board Meeting and considered the same and affirms	Acknowledged



			ended March 31st, 2023			submission of Corporate Governance Report for the year/quarter ended 31st March, 2023.		2023 after a delay of 55 days against the specified period required under Regulation 27(2) of SEBI (LODR) Regulations, 2015. In respect thereto, a non-compliance penalty imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.		that non-compliance of the provision is not mens rea on the part of the Company and it were not intentional rather it was circumstantial. In future Company will take extra precaution
4.	submission of compliance report on Corporate Governance within 21 days from the end of the quarter.	Regulation 27(2) of SEBI (LODR) Regulations, 2015	Delay in submission of Corporate Governance Report for the Half year/quarter ended	BSE Limited	Fine levied	Non-compliance of Regulation 27(2) of SEBI (LODR) Regulations, 2015 regarding delay in submission of	INR 37760 /-	The Corporate Governance Report for the Half year/quarter ended September 30th, 2023 were submitted to stock exchange on 9th November,	Board discussed the matter in the Board Meeting and considered the same to affirm that non-compliance	Acknowledged



			September 30 th , 2023.			Corporate Governance Report for the half year/quarter ended 30 th September, 2023.		2023 after a delay of 16 days against the specified period required under Regulation 27(2) of SEBI (LODR) Regulations, 2015. In respect thereto, penalty non-compliance imposed the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.		
5	Declaration and submission of financial results within 45 days from the end of the 30 th September, 2023.	Regulation 33 of SEBI (LODR) Regulations, 2015	Delay in submission of Un-Audited financial Result for the Quarter and Half Year Ended September 30 th ,	BSE Limit	Fine levied	Non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 regarding delay in submission of Un-Audited	INR 5,900 /-.	The audited financial Result for the Quarter and Half Year ended September 30 th , 2023 were submitted to stock exchange	Un-Board discussed the matter in the Board Meeting and considered the same and affirms that non-compliance	Acknowledged



		2023.			financial results for the Quarter and Half Year ended 30 th September, 2023.	16 th November, 2023 after delay of 1 day against the specified period required under Regulation 33(3)(d) SEBI(LODR) Regulations, 2015. In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CF D/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.	e of the provision is not means rea on the part of the Company and it were not intentional of rather it was circumstantial. In future Company will take extra precaution	
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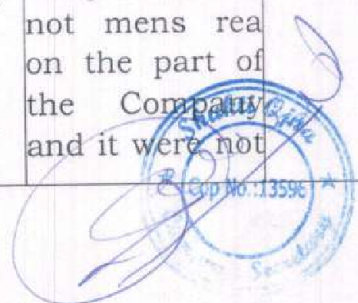
(b) The listed entity has taken the following actions to comply with the observations made in previous reports:



Sr. No.	Observations/Remarks of the Practicing Company Secretary	Observations made in the secretarial compliance report for the year ended 2023	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	<p>The disclosure of Related Party Transaction for FY ended March 31st, 2022 were submitted to stock exchange on 26st July, 2022 after a delay of 25 days against the specified period as required under Regulation 23(9) of SEBI(LODR) Regulations, 2015 further extended vide SEBI Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556/ dated April 29, 2021</p> <p>In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.</p>	<p>The disclosure of Related Party Transaction for FY ended March 31st, 2022 were submitted to stock exchange on 26st July, 2022 after a delay of 25 days against the specified period as required under Regulation 23(9) of SEBI(LODR) Regulations, 2015 further extended vide SEBI Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556/ dated April 29, 2021</p>	<p>Regulation 23(9) of SEBI(LODR) Regulations, 2015</p>	<p>Non-compliance of Regulation 23(9) of SEBI (LODR) Regulations, 2015 regarding delay in submission of disclosure of Related Party Transaction for the half year ended 31st March, 2022.</p> <p>Fine levied by Exchange of INR 1,47,500/-</p>	<p>Board discussed the matter in the Board Meeting and consider the same and affirms that non-compliance of the provision is not mens rea on the part of the Company and it were not intentional rather it was circumstantial.</p> <p>In future Company will take extra precaution.</p>	-



2.	<p>The Audited financial Result for the year ended March 31st, 2022 were submitted to stock exchange on 16th June, 2022 after a delay of 17 days against the specified period as required under Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015.</p> <p>In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.</p>	<p>The Audited financial Result for the year ended March 31st, 2022 were submitted to stock exchange on 16th June, 2022 after a delay of 17 days against the specified period as required under Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015.</p>	<p>Regulation 33 of SEBI(LODR) Regulations, 2015</p>	<p>Non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 regarding delay in submission of Audited financial results for the year ended 31st March, 2022.</p> <p>Fine levied by Exchange of INR 1,00,300/-</p>	<p>Board discussed the matter in the Board Meeting and consider the same and affirms that non-compliance of the provision is not mens rea on the part of the Company and it were not intentional rather it was circumstantial. In future Company will take extra precaution.</p>
3.	<p>The Unaudited Financial Results for the quarter ended June 30th, 2022 were submitted to stock exchange on 26th August, 2022 after a delay of 11 days against the specified period as required under Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015.</p>	<p>The Unaudited Financial Results for the quarter ended June 30th, 2022 were submitted to stock exchange on 26th August, 2022 after a delay of 11 days against the specified period as required under Regulation 33(3)(d) of SEBI(LODR) Regulations, 2015.</p>	<p>Regulation 33 of SEBI(LODR) Regulations, 2015</p>	<p>Non-compliance of Regulation 33 of SEBI (LODR) Regulations, 2015 regarding delay in submission of Unaudited financial results for the quarter ended 30th June, 2022.</p> <p>Fine levied by Exchange of</p>	<p>Board discussed the matter in the Board Meeting and consider the same and affirms that non-compliance of the provision is not mens rea on the part of the Company and it were not</p>



	In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.			INR 59,000/-	intentional rather it was circumstantial. In future Company will take extra precaution.
4.	The Corporate Governance Report for the year/quarter ended March 31 st , 2022 were submitted to stock exchange on 8 th June, 2022 after a delay of 47 days against the specified period as required under Regulation 27(2) of SEBI(LODR) Regulations, 2015. In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.	The Corporate Governance Report for the year/quarter ended March 31 st , 2022 were submitted to stock exchange on 8 th June, 2022 after a delay of 47 days against the specified period as required under Regulation 27(2) of SEBI(LODR) Regulations, 2015.	Regulation 27 (2) of SEBI(LODR) Regulations, 2015	Non-compliance of Regulation 27(2) of SEBI (LODR) Regulations, 2015 regarding delay in submission of Corporate Governance Report for the year/quarter ended 31 st March, 2022. Fine levied by Exchange of INR 1,10,920/-	Board discussed the matter in the Board Meeting and consider the same and affirms that non-compliance of the provision is not mens rea on the part of the Company and it were not intentional rather it was circumstantial. In future Company will take extra precaution.



5.	<p>The Corporate Governance Report for the half year/quarter ended September 30th , 2022 were submitted to stock exchange on 25th October, 2022 after a delay of 3 days against the specified period as required under Regulation 27(2) of SEBI(LODR) Regulations, 2015.</p> <p>In respect thereto, penalty for non-compliance as imposed by the stock exchange was paid by the Company within the stipulated time period as prescribed vide SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI SOP Circular.</p>	<p>The Corporate Governance Report for the half year/quarter ended September 30th , 2022 were submitted to stock exchange on 25th October, 2022 after a delay of 3 days against the specified period as required under Regulation 27(2) of SEBI(LODR) Regulations, 2015.</p>	<p>Regulation 27 (2) of SEBI(LODR) Regulations, 2015</p>	<p>Non-compliance of Regulation 27(2) of SEBI (LODR) Regulations, 2015 regarding delay in submission of Corporate Governance Report for the half year/quarter ended 30th September,2022.</p> <p>Fine levied by Exchange of INR 2360/-</p>	<p>Board discussed the matter in the Board Meeting and considered the same and affirms that non-compliance of the provision is not mens rea on the part of the Company and it were not intentional rather it was circumstantial. In future Company will take extra precaution</p>	
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II. I hereby report that, during the review period the compliance status of the listed entity is appended below;

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



6.	<u>Preservation of Documents:</u> 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.	<u>Performance Evaluation:</u> 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.	<u>Related Party Transactions:</u> (a) <u>The listed entity has obtained prior approval of Audit Committee for all Related party transactions</u> (b) <u>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</u>	Yes	
9.	<u>Disclosure of events or information:</u> 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.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Rsseregulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions 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	No	During the year under review BSE has levied fine on the company with reference to SEBI SOP Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 for delay in filing of different reports/documents/statement as prescribed under SEBI (LODR) Regulations, 2015 as mentioned above during the period under



	Regulations and circulars/ guidelines issued thereunder		review. Apart from that no other fines/penalty have been levied on the company in the financial year 2023-2024.
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries 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.	NA	During the period under review no such instances have occurred.
12.	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	There were no additional non-compliances.

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

Place: New Delhi
Date: **27/05/2024**



Shukti Ojha
(Designated Partner)
C.P.No: 13596
Peer Review: 5121/2023

UDIN: F010341F000458030