



# K.C.P. SUGAR AND INDUSTRIES CORPORATION LTD.

Regd. Office : "Ramakrishna Buildings", Post Box No. 727, No.239, (Old No.183), Anna Salai, Chennai - 600 006.  
Ph : 044 2855 5171 to 5176, 6551 4966 Fax : 044 2854 6617 / 2855 5863 E-mail : kcpsugar@vsnl.com  
CIN - L15421TN1995PLC033198

Ref:KSICL/STK.EX/ 2019-20

18.06.2020

**THE VICE PRESIDENT  
CAPITALMARKET( OPERATIONS )  
THE NATIONAL STOCK EXCHANGE OF  
INDIA LIMITED**  
Exchange Plaza, 5<sup>th</sup> Floor  
Plot No.C/1, G Block  
Bandra-Kurla Complex, Bandra (E)  
**Mumbai 400 051.**

**MANAGER  
CORPORATE RELATIONSHIP  
DEPT OF CORP SERVICES  
BOMBAY STOCK EXCHANGE LTD**  
Floor 25, PJ Towers  
Dalal Street  
**Mumbai 400 001**

**KCPSUGIND -EQ**

**Scrip ID: KCPSUGIND  
Scrip Code: 533192**

Dear Sir,

**Sub:** Regulation 24A of LODR submission of Annual Secretarial Compliance  
Report for the financial year 2019-20

We are attaching a scan copy of Annual Secretarial Compliance Report dt.17.06.2020  
issued by Jayashree S Iyer, Practicing Company Secretary for the financial year 2019-20.

Kindly take the same on record.

Thanking you,

Yours faithfully,  
For **K.C.P. SUGAR AND INDUSTRIES CORPORATION LIMITED**

**S CHIDAMBARAM  
COMPANY SECRETARY**

Encl: a/a

◇ Leading Manufacturers of Premium Grade Sugars, Rectified Spirit, Anhydrous Alcohol, Extranatural Alcohol, Co2, Calcium Lactate, Bio-Fertilizers, Bio-Compost and Mycorrhiza Inoculum.

|              |                 |                                |                    |                    |
|--------------|-----------------|--------------------------------|--------------------|--------------------|
| Factories at | - Vuyyuru,      | Krishna Dist., A.P. - 521 165. | Tel : 08676 232001 | Fax : 08676 232640 |
|              | - Lakshmipuram, | Krishna Dist., A.P. - 521 131. | Tel : 08671 222046 | Fax : 08671 222640 |

**Secretarial Compliance Report  
for the year ended 31/03/2020**

To

The Members  
K.C.P. Sugar and Industries Corporation Limited  
RAMAKRISHNA BUILDING,  
New No.239 (Old No.183)  
Anna Salai  
Chennai 600006

**CIN of the Company: L15421TN1995PLC033198**  
**Authorised Capital : Rs 25,00,00,000**

I have conducted Secretarial Compliance Audit of the applicable SEBI (Securities and Exchange Board of India) Regulations, circulars and guidelines issued thereunder for the Financial Year ended 31<sup>st</sup> March 2020 of **K.C.P. Sugar and Industries Corporation Limited** ("the Company"). The audit was conducted in a manner that provided me a reasonable basis for evaluating the statutory compliances and expressing my opinion thereon.

I have examined:

- (a) all the documents and records made available to me and explanation provided by **K.C.P. Sugar and Industries Corporation Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.3.2020 ("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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



**JAYASHREE S IYER**  
**PRACTISING COMPANY SECRETARY, INSOLVENCY PROFESSIONAL & REGISTERED VALUER**

- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;  
(d) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with the Client;

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, **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  |
|-------|--|--|--|
| 01    | Regulation 33 - Filing of consolidated financials alongwith standalone financials for the Quarter ended 30 <sup>th</sup> June 2019 | Delay in furnishing of consolidated financials for the first Quarter ended 30th June 2019 and payment of fine. | The standalone financials was filed with both the Exchanges viz., NSE and BSE within the stipulated timeline. However, filing of quarterly consolidated financials as per amended provisions was filed by the Company only on 7.10.2019. |
| 02    | Regulation 34 - Filing of Annual Report  | Delay in filing of Annual Report with NSE and BSE  | The Company has represented to Stock Exchanges for waiver of fine and refund of the same. The fine has been refunded by NSE while the refund is still awaited from BSE.  |

- (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/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:

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| Sr. No. | Action taken by | Details of violation  | Details of action taken<br>E.g. fines, warning letter, debarment, etc.   | Observations/ remarks of the Practicing Company Secretary, if any.  |
|---------|-----------------|---|--|---|
| 01      | NSE             | 1. Delay in submission of consolidated financials for the first Quarter ended 30 <sup>th</sup> June 2019 and payment of fine<br><br>2. Delay in filing of Annual Report | Fine of Rs 2,12,400/- + Rs 1,00,300/- was levied<br><br>Freezing of promoters holdings<br><br>Fine of Rs 80,240/- was levied | The Company has paid a fine of Rs 2,12,400/- on 27.09.2019, post which the action of freezing of promoters holdings was reversed by the Stock Exchange. Based on actual number of days of delay, an additional fine of Rs 1,00,300/- was levied by NSE and the same was paid on 05.11.2019.<br><br>Further NSE vide its Circular Ref No: NSE/CML/2019/21 has informed that as stated in the SEBI Informal Guidance issued on August 2, 2019 in the matter of Shriram Transport Finance Company Limited, it is mandatory for listed companies to file quarterly / year to date consolidated financial results. For this purpose, Companies are required to consolidate the financial statements of Subsidiary and or its Associate companies / Joint ventures as the case may be, with the Standalone results of the listed company. The Consolidated Financial Results as mentioned above shall be submitted to the Exchange from the quarter ending September 30, 2019 onwards.<br><br>In view of the above circular, the Company has applied for refund of the fine paid by them. The refund of the same is still awaited.<br><br>On request made by the Company, the fine was refunded by NSE. |
| 02      | BSE             | 1. Delay in submission of the financial   | Fine of Rs 88,500/- + Rs 2,30,100/- was levied   | Fine of Rs 88,500/- was remitted on 27.09.2019 consequent to which the action of freezing of promoters holdings   |



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|  |   |                                |  |
|--|---|--------------------------------|--|
|  | statements within the period prescribed under the regulation for the first Quarter ended 30 <sup>th</sup> June 2019 | Freezing of promoters holdings | was reversed by SE. Based on actual number of days of delay, an additional fine of Rs 2,30,100/- was levied by BSE and the same was paid on 05.11.2019.<br><br>The Company has applied for refund of the fine paid by them. The refund of the same is still awaited. |
|  | 2.Delay in filing of Annual Report  | Fine of Rs 80,240/- was levied | The Company has requested BSE for waiver of fine and the refund is still awaited.  |

(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...<br>(The years are to be mentioned) | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|---|--|--|
| NIL     |  |   |  |  |

*Jayashree*



Place: Chennai  
Date: 17.06.2020

Jayashree S Iyer  
Practicing Company Secretary  
M. No. F10394  
C.P No.: 21403  
UDIN: F010394B000352384

Note: Due to Covid19 pandemic impact, the compliance documents for the year April 2019 to March 2020 were obtained through electronic mode and verified.