THE UGAR SUGAR WORKS LIMITED.

Works E-mail **Regd.** Office E-mail

Ugar Khurd - 591 316, Dist.Belgaum, Karnataka helpdesk@ugarsugar.com Mahaveernagar, Sangli - 416 416, Maharashtra.

usw.sangli@ugarsugar.com.

Phone Website Phone TIN No.

www.ugarsugar.com -91 233 2623717, 2623716 Fax * -91 233 2623617 29520007001, PAN-AAACT7580R GSTIN NO * 29AAACT7580R1ZD. ECC No.AAACT7580 RXM001. (CIN - L15421PN1939PLC006738)

Sec

To. The Executive Director,

Bombay Stock Exchange Ltd., P J Towers, Dalal Street, Mumbai. Tel No: (022) 22721234 Fax No: (022) 22721278/22722039

Stock Code: 530363

Date: 26/05/2022

To, **Corporate Communications**

National Stock Exchange of India Ltd. Exchange Plaza, Plot no. C/1, G Block Bandra-Kurla Complex, Bandra (E) Mumbai - 400 051 Tel No: (022) 26598148 Fax No: (022) 26598120

-91 8339 274000 (5 Lines) Fax * -918339 272232

Stock Code: UGARSUGAR

Dear Sir,

Sub: - Annual Secretarial Compliance Report Puesuant to Regulation 24(A)

Pursuant to Regulation 24 (A) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Annual Secretarial Compliance Report for the financial year 2021-22.

Kindly take the same on record and acknowledgment the receipt of the same.

Thanking you, Yours faithfully, For The Ugar Sugar Works Ltd.

Tushar V Deshpande **Company Secretary** M. No: A45586



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ABHAY R. GULAVANI

B.Com., LL.B.(Spl.), PGDIB, CS

PRACTICING COMPANY SECRETARY

Office Address : 'GANESH VANDAN' Apts, Flat No. 202, Gandhi Colony, Opp. Ganapati Mandir, Vishrambag, Sangli - 416415.

Residence : "Yadneshwar Bunglow", Near Murtikar Joshi, Behind Court, Killa Bhag, Miraj - 416 410, Dist-Sangli.

Office Phone : (0233) 2302482, M : +91 9423871452, Email : abhaygulavani@rediffmail.com

Secretarial compliance report of The Ugar Sugar Works Limited (CIN-L15421PN1939PLC006738) for the year ended 31-03-2022

(Pursuant to Regulation 24A of SEBI (LODR) Regulations 2015)

- I, Mr. Abhay R Gulavani, Practicing Company Secretary, has examined:-
- (a) all the documents and records made available to us and explanation provided by The Ugar Sugar Works Limited (CIN-L15421PN1939PLC006738) ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to both the stock exchanges BSE and NSE,
- (c) website of the listed entity www.ugarsugar.com,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended [31-03-2022] ("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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client.

and circulars/ guidelines issued thereunder;

As informed by the Company, the following Regulations were not applicable to the Company:-

a) The Securities and Exchange Board of India (Issue of Capital and Disclosure



Requirements) Regulations, 2009;

- b) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999;
- c) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- d) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;
- e) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998; Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;

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. Our observation is as under:-

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

Sr No	Action taken by	Details violation	of	taken E.g. fines,	Observations/ remarks of the Practicing Company Secretary, if any.
	NIL	NIL		NIL	NIL



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

Sr	Observations of the	Observations	Actions taken by the	Comments of the
No	Practicing Company	made in the	listed entity, if any	Practicing Company
	Secretary in the previous	secretarial		Secretary on the actions
	reports	compliance		taken by the listed entity
		report for the		
		year ended		
		(The years are to		
		be mentioned)		
1	Company has not		Company has submitted	Company has submitted
	submitted the voting	2020-21	the Voting Results on	a letter to NSE on 01-10-
	results of AGM in XBRL		Stock exchange portal	2020, informing that, the
	mode within the time and		within time in all other	late submission was
	there was a delay of 1		modes except there was	purely due to technical
	hour in submission. Letter		a delay of 1 hour in	issues with the system
	received from NSE.		submitting the results in	due to distant access to
			XBRL mode.	the system due to COVID-
				19 restrictions, scanning
				issues, as the staff was
				working from their own
				places as they could not
				come to office.
2	Company has not	2020-21	Company has submitted	Action has been taken by
	provided the details		a letter to NSE alongwith	the Company.
	relating to fees paid to		the details as required in	
	auditors in network		its letter Dated 15-12-	
	entities as well as to		2020 vide NSE/	
	provide a certificate on		LIST/17093 alongwith	.XC
	the disqualification of		the Certificate as per	
	directors in its Annual		Regulation 34 and the	A:
	Report for 31-03-2020.		same was also displayed	
			on Company website.	

Place : Sangli Date : 23-05-2022 UDIN: Peer Review Cert No

& Cylladau

Abhay R. Gulavani Practicing Company Secretary FCS: 10668; CP: 10741 F010668D000363781 1841/2022

