

DAVANGERE SUGAR
COMPANY LIMITED
CIN : U01115KA1970PLC001949

June 29, 2021

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

Scrip Code: 543267

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021 under Regulation 24A of SEBI (Listing Obligation & Disclosure Requirements), 2015 read with SEBI circular No. IR/CFD/CMD1/27/2019 dated February 08, 2019.

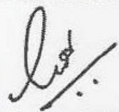
Dear Sir/Madam,

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, 2021 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



Ganesh S Shamanur
Managing Director
DIN: 00451383



SECRETARIAL COMPLIANCE REPORT OF DAVANGERE SUGAR COMPANY LIMITED FOR THE FINANCIAL YEAR ENDED MARCH 31, 2021

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:

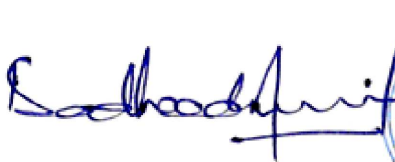

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
			NIL	

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
		Not Applicable	

**Note: The Company became a listed entity w.e.f. March 19, 2021 and hence the compliance of all the aforementioned laws became applicable as on March 19, 2021 .Hence, the period of review considered for the issue of this report has been from 19-03-2021 to 31-03-2021.*

For Amit R. Dadheech & Associates

Amit R. Dadheech
ACS No. 22889, COP No. 8952

Date: June 30,2021

Place:Mumbai