



# K.M. Sugar Mills Ltd.

Factory & Works : P.O. Motinagar-224201, Dist. Ayodhya (U.P.)  
Phone : 7571000692, Email : director@kmsugar.com  
CIN No.: L15421UP1971PLC003492 GSTIN No.: 09AAACK5545P1ZZ

Date: 07.02.2022

National Stock Exchange Of India Limited. Exchange Plaza,C-1,Block-G, Bandra Kurla Complex ,Bandra (E), Mumbai-400051 Phone No.022-26598100	Bombay Stock Exchange Limited, 27 <sup>th</sup> Floor, Phiroze Jeebhoy Tower, Dalal Street ,Fort ,Mumbai-400001 Phone No.022-22728527 Bandra (E),Mumbai-400051
Scrip Code: INE157h01023	Scrip Code:532673

Dear Sirs,

Sub: Intimation under Regulation 31A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI Listing Regulations).

Request received from Mrs. Uma Jhunjunwala, Prakash Chandra Dwarkadas Jhunjunwala -HUF and Ms. Madhu Jhunjunwala for reclassification of shareholding from 'Promoter Group' to 'Public' Category

Please find attached a request letter dated 07<sup>th</sup> February, 2022, received from the following promoter for being reclassification from 'Promoter and Promoter Group' to 'Public' category.

Name	Category	No. of shares held	% of capital
Prakashchandra Dwarkadas Jhunjunwala -HUF	Promoter Group	32,78,271	3.56
Umadevi Jhunjunwala	Promoter Group	25,51,717	2.77
Madhu Prakash Jhunjunwala	Promoter Group	15,71,660	1.71
		<b>74,01,648</b>	<b>8.04</b>

The above requests will be considered by the Board of Directors of the Company in the forthcoming Meeting in accordance with the Listing Regulations. Accordingly, the Company shall inform the Stock Exchange about the decision taken by the Board of Directors

The above is for your information and records.

Yours Faithfully,  
For K.M Sugar Mills Limited

  
Pooja Dua

Company Secretary- cum-Compliance officer

**UMA DEVI JHUNJHUNWALA**

509, HIMALAYA HOUSE, PALTON ROAD,  
MUMBAI, 400001, Maharashtra

Date: 07-02-2022

To,  
Board of Director,  
KM Sugar Mills Ltd,  
11, MotiBhawan,  
Collectorganj,  
Kanpur UP-208001

Dear Sir,

**Sub: Application for Re-classification under Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

The name of myself (Smt. Uma Devi Jhunjunwala), wife of late Prakashchandra Dwarkadas Jhunjunwala, my daughter (Ms. Madhu Prakash Jhunjunwala) and HUF (Prakashchandra Dwarkadas Jhunjunwala - HUF) is appearing as Promoter Group of K M Sugar Mills Limited (hereinafter referred to as "the Company"), perhaps due to relationship of my husband Late Prakashchandra Dwarkadas Jhunjunwala.


I submit that as I neither exercise any control over the Company, directly or indirectly, nor do I have any influence over the Board of Directors nor any key managerial personnel of the Company, nor do I hold substantial shareholding in the Company, which is evident from the following chart as on date:

S.NO	NAMES	NUMBER OF SHARES	%	PAN
1	Prakashchandra Dwarkadas Jhunjunwala -HUF	32,78,271	3.56	AADHJ9565J
2	Umadevi Jhunjunwala	25,51,717	2.77	ABQPJ7823H
3	Madhu Prakash Jhunjunwala	15,71,660	1.71	AANPJ9742R
	<b>TOTAL</b>	<b>74,01,648</b>	<b>8.04</b>	

I am in age bracket of 69 years and therefore I wish to get my status reclassified from "Promoter & Promoter Group category" to "Public Category" for the reasons as stated above, during my lifetime to avoid any issues in future. I believe that my request squarely falls under the ambit of SEBI laws and is in line with the established norms and practices of securities market. Other two persons, who are presently shown in category of "Promoter & Promoter Group", due to my relations with them, are also filing separate applications for your consideration and doing the needful.

I have also attached a signed undertaking stating all the important facts which are necessary for undertaking such reclassification. I will be happy to provide you with any documents, declarations, writings, information or undertakings, as you may require, for the purposes of reclassification.

In view of the above it is requested to reclassify the above referred persons from "Promoter & Promoter Group category" to "Public Category" in terms of the provisions of regulation 31A of the Securities & Exchange Board of India (Listing Obligation & Disclosure Requirements) Regulation, 2015.



(Uma Devi Jhunjunwala)

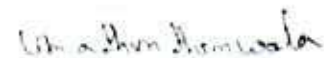
**UMA DEVI JHUNJHUNWALA**

**509, HIMALAYA HOUSE, PALTON ROAD,  
MUMBAI, 400001, Maharashtra**

### **Undertaking for Reclassification**

With regard to my request for reclassification of "Promoter & Promoter Group" to "Public Category" shareholders of K M Sugar Mills Limited (hereinafter referred as, the "Company") and in accordance with Regulation 31A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, I together with other related persons seeking reclassification confirm and undertake the following:

1. That I do not hold more than ten percent of the total voting rights in the Company.
2. That I do not, directly or indirectly, exercise control over the affairs of the Company.
3. That I do not possess any special rights, through any formal or informal arrangements, in the Company.
4. That I am not associated with the Company in the capacity of its director.
5. That I am not associated with the Company in the capacity as key managerial personnel.
6. That I am not 'wilful defaulter' as per the Reserve Bank of India Guidelines.
7. That I am not fugitive economic offender.
8. That there are no pending regulatory actions against me.
9. That neither am I privy to any price sensitive information about the Company currently and nor do I wish to participate in any of the affairs of the Company post such reclassification.
10. That I undertake to continue the compliance with declarations made in para 1 to 5 above in terms of the requirement of regulation 31A(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for a period of not less than three years from the date of such re-classification.



Uma Devi Jhunjunwala

Date: 07-02-2022

Place: Mumbai

**PRAKASH CHANDRA  
DWARKADAS JHUNJHUNWALA-HUF**

509, HIMALAYA HOUSE, PALTON ROAD,  
MUMBAI, 400001, Maharashtra

Date: 07-02-2022

To,  
Board of Director,  
KM Sugar Mills Ltd,  
11, MotiBhawan,  
Collectorganj,  
Kanpur UP-208001

Dear Sir,

**Sub: Application for Reclassification under Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

The name of myself (Uma Devi Jhunjunwala ) as a karta of HUF (Prakash Chandra Dwarkadas Jhunjunwala -HUF) (PCDJ-HUF), is appearing as "Promoter & Promoter Group" of K M Sugar Mills Limited (hereinafter referred to as "the Company"), perhaps due to relationship of my husband Late Prakashchandra Dwarkadas Jhunjunwala.

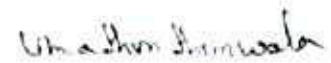
As a Karta of PCDJ-HUF, It is hereby submitted that as I neither exercise any control over the Company, directly or indirectly, nor do I have any influence over the Board of Directors nor any key managerial personnel of the Company, nor do I hold substantial shareholding in the Company, which is evident from the following chart as on date:

S.NO	NAMES	NUMBER OF SHARES	%	PAN
1	Prakashchandra Dwarkadas Jhunjunwala -HUF	32,78,271	3.56	AADHJ9565J
2	Umadevi Jhunjunwala	25,51,717	2.77	ABQPJ7823H
3	Madhu Prakash Jhunjunwala	15,71,660	1.71	AANPJ9742R
	<b>TOTAL</b>	<b>74,01,648</b>	<b>8.04</b>	

Mrs. Uma Devi Jhunjunwala is in age bracket of 69 years and therefore wish to get her status corrected from "Promoter & Promoter Group category" to "Public Category" for the reasons as stated above, during his lifetime to avoid any issues in future. I as a karta of the said HUF believe that my request squarely falls under the ambit of SEBI laws and is in line with the established norms and practices of securities market.

It has also attached a signed undertaking stating all the important facts which are necessary for undertaking such reclassification. I will be happy to provide you with any documents, declarations, writings, information or undertakings, as you may require, for the purposes of reclassification.

In view of the above it is requested to reclassify the above referred Prakash Chandra Dwarkadas Jhunjhunwala -HUF from "Promoter & Promoter Group category" to "Public Category" in terms of the provisions of regulation 31A of the Securities & Exchange Board of India (Listing Obligation & Disclosure Requirements) Regulation, 2015.



Uma Devi Jhunjhunwala -Karta  
(For Prakash Chandra Dwarkadas Jhunjhunwala-HUF)

**PRAKASH CHANDRA  
DWARKADAS JHUNJHUNWALA-HUF**

509, HIMALAYA HOUSE, PALTON ROAD,  
MUMBAI, 400001, Maharashtra

### **Undertaking for Reclassification**

With regard to my request for reclassification of "Promoter & Promoter Group" to "Public Category" shareholders of K M Sugar Mills Limited (hereinafter referred as, the "Company") and in accordance with Regulation 31A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, I together with other related persons seeking reclassification confirm and undertake the following:

1. That It does not hold more than ten percent of the total voting rights in the Company.
2. That It does not, directly or indirectly, exercise control over the affairs of the Company.
3. That It does not possess any special rights, through any formal or informal arrangements, in the Company.
4. That It is not associated with the Company in the capacity of its director.
5. That It is not associated with the Company in the capacity as key managerial personnel.
6. That It is not 'wilful defaulter' as per the Reserve Bank of India Guidelines.
7. That It is not fugitive economic offender.
8. That there are no pending regulatory actions against it.
9. That neither is it privy to any price sensitive information about the Company currently and nor do it wish to participate in any of the affairs of the Company post such reclassification.
10. That it undertake to continue the compliance with declarations made in para 1 to 5 above in terms of the requirement of regulation 31A(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for a period of not less than three years from the date of such re-classification.



Uma Devi Jhunjhunwala -Karta  
(For Prakash Chandra Dwarkadas Jhunjhunwala-HUF)

Date: 07-02-2022

Place: Mumbai

**MADHU JHUNJHUNWALA**

509, HIMALAYA HOUSE, PALTON ROAD,  
MUMBAI, 400001, Maharashtra

Date: 07-02-2022

To,  
Board of Director,  
KM Sugar Mills Ltd,  
11, MotiBhawan,  
Collectorganj,  
Kanpur UP-208001

Dear Sir,

**Sub: Application for Reclassification under Regulation 31A(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

The name of myself (Ms. Madhu Prakash Jhunjhunwala) daughter of Late (Prakash Chandra Dwarkadas Jhunjhunwala) and Smt. (Uma Devi Jhunjhunwala) is appearing as "Promoter" of K M Sugar Mills Limited (hereinafter referred to as "the Company"), perhaps due to relationship of my father Late Prakashchandra Dwarkadas Jhunjhunwala.

I submit that as I neither exercise any control over the Company, directly or indirectly, nor do I have any influence over the Board of Directors nor any key managerial personnel of the Company, nor do I hold substantial shareholding in the Company, which is evident from the following chart as on date:

S.NO	NAMES	NUMBER OF SHARES	%	PAN
1	Prakashchandra Dwarkadas Jhunjhunwala -HUF	32,78,271	3.56	AADHJ9565J
2	Umadevi Jhunjhunwala	25,51,717	2.77	ABQPJ7823H
3	Madhu Prakash Jhunjhunwala	15,71,660	1.71	AANPJ9742R
	<b>TOTAL</b>	<b>74,01,648</b>	<b>8.04</b>	

My mother Mrs. Uma Devi Jhunjhunwala, is in age bracket of 69 years and therefore wish to get her status corrected from "Promoter & Promoter Group category" to "Public Category" for the reasons as stated above, during her lifetime to avoid any issues in future. I believe that my request squarely falls under the ambit of SEBI laws and is in line with the established norms and practices of securities market.

I have also attached a signed undertaking stating all the important facts which are necessary for undertaking such reclassification. I will be happy to provide you with any documents, declarations, writings, information or undertakings, as you may require, for the purposes of reclassification.

In view of the above it is requested to reclassify the above referred persons from "Promoter & Promoter Group category" to "Public Category" in terms of the provisions of regulation 31A of the Securities & Exchange Board of India (Listing Obligation & Disclosure Requirements) Regulation, 2015.



**Madhu Prakash Jhunjunwala**

**Date: 07-02-2022**

**Place: Mumbai**



**MADHU JHUNJHUNWALA**

**509, HIMALAYA HOUSE, PALTON ROAD,  
MUMBAI, 400001, Maharashtra**

**Undertaking for Reclassification**

With regard to my request for reclassification of "Promoter & Promoter Group" to "Public Category" shareholders of K M Sugar Mills Limited (hereinafter referred as, the "Company") and in accordance with Regulation 31A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, I together with other related Promoters seeking reclassification confirm and undertake the following:

1. That I do not hold more than ten percent of the total voting rights in the Company.
2. That I do not, directly or indirectly, exercise control over the affairs of the Company.
3. That I do not possess any special rights, through any formal or informal arrangements, in the Company.
4. That I am not associated with the Company in the capacity of its director.
5. That I am not associated with the Company in the capacity as key managerial personnel.
6. That I am not 'wilful defaulter' as per the Reserve Bank of India Guidelines.
7. That I am not fugitive economic offender.
8. That there are no pending regulatory actions against me.
9. That neither am I privy to any price sensitive information about the Company currently and nor do I wish to participate in any of the affairs of the Company post such reclassification.
10. That I undertake to continue the compliance with with declarations made in para 1 to 5 above in terms of the requirement of regulation 31A(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for a period of not less than three years from the date of such re-classification.



Madhu Prakash Jhunjunwala

Date: 07-02-2022

Place: Mumbai