

26th April, 2024

To
The BSE Limited
Corporate Relationship Department,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai-400001

The Calcutta Stock Exchange Limited
7, Lyons Range,
Kolkata-700 001

Dear Sir,

Sub: Annual Secretarial Compliance Report under regulation 24A of SEBI (LODR) Regulation 2015.

We enclosed the Annual Secretarial Compliance Report of the Company under regulation 24A of SEBI (LODR) Regulation 2015, duly issued by Mrs. Meena Mishra, Practicing Company Secretary, for the financial year ended March 31, 2024.

This is for your information and records.

Thanking you,

Yours faithfully,
For Shree Hanuman Sugar & Industries Limited



Datta Ram Gill
Director

Encl: As above

**Secretarial compliance report of M/s. Shree Hanuman Sugar &
Industries Ltd. (CIN: L15432WB1932PLC007276)
for the year ended 31st March, 2024**

I, Meena Mishra, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. Shree Hanuman Sugar & Industries Ltd. ("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 Review Period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Review Period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Review Period);**
- (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 Review Period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



MEENA MISHRA

Practicing company secretary
B.com(H),CS,LLB

11A Kings Road

Howrah-711101

Contact.No:8981219475

Email id:meenachowdhary@gmail.com

chowdharymeena7@gmail.com

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

and based on the above examination, I hereby report that, during the Review Period, The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder,

(a) The listed entity has taken the following actions to comply with the observations made in previous reports dated 31.03.2023:

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	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Submission of quarterly and year-to-date standalone financial results to the stock exchange within sixty days of last quarter	Regulation 33(3) of SEBI (LODR) Regulation 2015	Delay in submission of financial result for quarter and year ended 31st March, 2022	BSE Ltd.	BSE has imposed fine for delay in submission of financial result for quarter and year ended 31st March, 2022 and freeze the promoter demat account of the Company	The Company has submitted financial result delay	Rs. 177000/-	As per information received in submission of financial result is due to delay in finalization of financial statement quarter and year ended 31st March 2022	The Company informed the stock exchange about the payment of Rs. 177000/- made on 29.10.2022 and requested to defreeze the promoter's demat account at the earliest	The Company sent various reminder mails to BSE to defreeze the promoters' demat account, but no response received from the BSE till date.



MEENA MISHRAPracticing company secretary
B.com(H),CS,LLB

11A Kings Road

Howrah-711101

Contact.No:8981219475

Email id:meenachowdhary@gmail.com

chowdharymeena7@gmail.com

2	Submission of quarterly standalone financial results to the stock exchange within forty-five days of end of each quarter,	Regulation 33(3) of SEBI (LODR) Regulation 2015	Delay in submission of financial result for quarter ended 30th June 2022	Stock Exchange	BSE has imposed fine for delay in submission of financial result for quarter ended 30th June 2022. and freeze the promoter demat account of the Company	Delay in submission of financial result for quarter ended 30th June 2022	Rs. 41300/-	As information received in submission of financial result is due to delay in finalization of financial statement for quarter ended 31st March 2022	per The Company informed the stock exchange about the payment of Rs. 177000/- made on 29.10.2022 and requested to defreeze the promoter's demat account at the earliest	The Company sent various reminder mails to BSE to defreeze the promoters' demat account, but no response received from the BSE till date.
---	---	---	--	----------------	---	--	-------------	--	---	---

Affirmations in Annual Secretarial Compliance Report (ASCR) in terms of the BSE circular Reference No. 20230410-41 dated: April 10,2023

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	Secretarial Standards: 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.	Adoption and timely updation of the Policies: <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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	Yes	



MEENA MISHRA

Practicing company secretary
B.com(H),CS,LLB

11A Kings Road

Howrah-711101

Contact.No:8981219475

Email id:meenachowdhary@ymail.com

chowdharymeena7@gmail.com

3.	Maintenance and disclosures on Website: <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.	Disqualification of Director: <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013as confirmed by the listed entity.</p>	Yes	
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: <ul style="list-style-type: none">(a) Identification of material subsidiary companies(b) Disclosure requirement of material as well as other subsidiaries	NA	As per information received, the Company has no subsidiaries. Since this clause will not applicable on the Company



MEENA MISHRA

Practicing company secretary
B.com(H),CS,LLB

11A Kings Road
Howrah-711101
Contact.No:8981219475
Email id:meenachowdhary@ymail.com
chowdharymeena7@gmail.com

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
6.	Preservation of Documents: 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.	Performance Evaluation: 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.	Related Party Transactions: (a)The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b)The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes	-
9.	Disclosure of events or information: 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.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-



MEENA MISHRA

Practicing company secretary
B.com(H),CS,LLB

11A Kings Road
Howrah-711101

Contact.No:8981219475

Email id:meenachowdhary@ymail.com
chowdharymeena7@gmail.com

Sr. No.	Particulars	Compliance Status (Yes/No/N/A)	Observations/Remarks by PCS*
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been 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 Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein (**).	Yes	
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	No	Composition of the Board is not as per regulation 17 of SEBI (LODR). <ul style="list-style-type: none">• no executive director on the Board of the Company during the financial year ended 31st March 2024• No KMP is there on board as required in SEBI (LODR) regulation

Note:

- An application u/s 7 of the Insolvency and Bankruptcy Code, 2016 has been filed by Stressed Assets Stabilization Fund (SASF), against the Company, invoking the corporate guarantee in the matter of Eastern Sugar & Industries Limited. The matter is pending for admission before the NCLT, Kolkata Bench.
- An order dated 15.03.2024, passed by the Recovery Officer, Debt Recovery Tribunal, Patna in RP 33/2010 Bank of India Vs Eastern Sugar & Industries Ltd., has executed attachment of PAN of the Company (PAN: AAEC50448M) and Shruti Limited (PAN: AADCS7585G) promoter of the Shree Hanuman & Industries Ltd., being the guarantors of the debts of Eastern Sugar & Industries Ltd.

Place: Kolkata

Date: 25/04/2024

UDIN: A041084F000242692

CS MEENA MISHRA
PROPRIETRESS
MEMBERSHIP NO. 41084


PRACTICING COMPANY SECRETARY
CP NO. 16829

Name : Meena Mishra
ACS No.: 41084
C P No.: 16829