## C THIRUMURTHY AND ASSOCIATES

Company Secretaries \*

## C Thirumurthy B Com BL FCS

29-1 LM/ Colony, Pappanaickenpalayam, Coimbatore - 641-037, Tamil Nadu. INDIA. Phono (91) 0422-4214979, Mobile: 98430 96789, 98430 19809, e-mail: mycsoffice@gmail.com

## Annual Secretarial compliance report of M/s. Bannari Amman Sugars Limited for the year ended 31.03.2021

- I, We, M/s. C Thirumurthy and Associates, Practising Company Secretaries have examined:
  - (a) all the documents and records made available to us and explanation provided by M/s. Bannari Amman Sugars 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 31.03.2021 in respect of compliance with the provisions of :

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Âct") 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.THIRUMURTHY, B.Com. B.L. FGS...
PRACTISING COMPANY SECRETARY
FCS 3454 CP 5179

- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

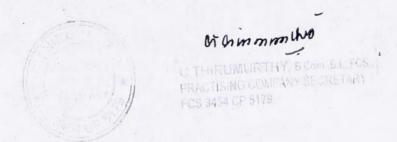
and circulars/ guidelines issued thereunder;

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 Requ    | irement Deviations | Observatio | Observations/ |  |
|--------|--------------------|--------------------|------------|---------------|--|
|        | (Regulations/ circ | ulars /            | Remarks    | of the        |  |
|        | guidelines in      | cluding            | Practicing | Company       |  |
|        | specific clause)   |                    | Secretary  |               |  |
|        |                    | NONE               |            |               |  |

(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<br>violation | of |      |  |
|---------|-----------------|----------------------|----|------|--|
|         |                 |                      | 1  | IONE |  |

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

| Sr.<br>No. | the Practicing Company | Observations made in the Previous Secretarial Compliance Report | by the listed<br>entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|------------|------------------------|---|---------------------------------|--|
|------------|------------------------|---|---------------------------------|--|

There was no observation made in the previous report for the financial year ended on March 31, 2020.

UMU

RETARY

Place: Coimbatore Date: 09.05.2021

UDIN: F003454 C000264022

