

AVADH/SE/2021-22/15

May 31, 2021

The Manager  
Listing Department  
National Stock Exchange of India Limited  
'Exchange Plaza'  
C - 1, Block G  
Bandra-Kurla Complex  
Bandra (E)  
Mumbai 400051  
**SYMBOL – AVADHSUGAR**

The Manager  
Listing Department  
BSE Ltd.  
1st Floor, New Trading Ring  
Rotunda Building  
P.J. Towers  
Dalal Street, Fort  
Mumbai-400 001  
**STOCK CODE – 540649**

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2021**

Pursuant to the Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, enclosed please find the Annual Secretarial Compliance Report for the financial year 2020-21.

You are requested to kindly take the above information on record.

Thanking you,

Yours faithfully,  
**For Avadh Sugar & Energy Limited**

  
Anand Sharma  
Company Secretary  
FCS - 7305



Encl – as above



**K. K. BIRLA GROUP OF SUGAR COMPANIES**

Corporate Office: 5<sup>th</sup> Floor, Birla Building, 9/1 R. N. Mukherjee Road, Kolkata 700 001 . Email: [birlasugar@birla-sugar.com](mailto:birlasugar@birla-sugar.com)

Phone: + 91 33 2243 0497 / 8, 2248 7068, 3057 3000, 3041 0900 . Fax: + 91 33 2248 6369

Regd. Office: P.O. Hargaon, Dist. Sitapur, U.P., PIN 261 121 . Website: [www.birla-sugar.com](http://www.birla-sugar.com) . CIN: L15122UP2015PLC069635

# VINOD KOTHARI & COMPANY

Practising Company Secretaries

1006-1009, Krishna Building, 224 A.J.C. Bose Road

Kolkata – 700 017, India

Phone: +91 – 33 – 2281 7715 | 1276 | 3742

email: [vinod@vinodkothari.com](mailto:vinod@vinodkothari.com)

Web: [www.vinodkothari.com](http://www.vinodkothari.com)

[www.india-financing.com](http://www.india-financing.com)

Unique Code – P1996WB042300

GSTIN No.-19AAMFV672E1ZR

PAN No - AAMFV6726E

Udyog Aadhaar Number – WB10D0000448

## Secretarial Compliance Report of Avadh Sugar & Energy Limited for the financial year ended 31<sup>st</sup> March, 2021

*[Pursuant to the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February 2019]*

We, Vinod Kothari & Company, Practicing Company Secretaries, have examined:

- a) all the documents and records made available to us and explanations provided by Avadh Sugar & Energy Limited (“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<sup>st</sup> March, 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 (**‘SEBI LODR Regulations’**);
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (**‘SEBI ICDR Regulations’**); Not applicable
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (**‘SEBI Takeover Regulations’**);
- d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (**‘SEBI PIT Regulations, 2015’**);
- e) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- f) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- g) The Securities and Exchange Board of India (Debenture Trustee) Regulations, 1993 (in relation to obligations of Issuer Company); Not applicable

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- h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: Not applicable;
- i) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: Not applicable;
- j) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: Not applicable;
- k) The Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013: Not applicable

and circulars/ guidelines issued thereunder.

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 the matters specified below:

Sr. No.	Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company 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 of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/remarks of the Practicing Company
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				Secretary, if any.
None				

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

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March, 2020	Actions taken by the Listed Entity, if any	Comments of the Practising Company Secretary on the actions taken by the Listed Entity
None				

(e) The Listed Entity has complied with the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019, in terms of Para 6(A) and 6(B) of the said circular and has suitably modified the terms of appointment of its statutory auditors vide Amendment Letter dated 6<sup>th</sup> November, 2019.

For M/s Vinod Kothari & Company  
Company Secretaries in Practice  
Unique Code: P1996WB042300



**Munni Phukon**  
Partner

Membership No: A60355

CP No.: 22846

UDIN: A060355C000282522

Peer Review Certificate No.: 781/2020

Place: Kolkata  
Date: 12<sup>th</sup> May 2021