



**Regd. Office :** Premises No. 9, Ground Floor, Vasundhara Building  
2/7, Sarat Bose Road, Kolkata - 700 020, W.B. , Phone : 033 - 2282 1184  
E-mail : shsil@nopoly.in / info@hanumansugar.com, Website : www.hanumansugar.com  
CIN : L15432WB1932PLC007276

1<sup>st</sup> May, 2025

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 Ms. Nupur Mimani, Practicing Company Secretary, for the financial year ended March 31, 2025.

This is for your information and records.

Thanking you,

Yours faithfully,  
For Shree Hanuman Sugar & Industries Limited



Resolution Professional  
IBBI/PA-001/IP-P00532/2017-2018/10957

Encl: As above



CS NUPUR MIMANI  
Membership Number – 37847  
C.P. Number – 16805  
(Peer reviewed Practitioner)

Address: - 1, Shibtala Ghat Lane, Bhadrakali, Hooghly, 712232(WB)  
Email: - [nupur.mimani7@gmail.com](mailto:nupur.mimani7@gmail.com)  
(M) – 91636762333

**Secretarial compliance report of M/s. Shree Hanuman Sugar & Industries Ltd.**  
**(CIN: L15432WB1932PLC007276) for the year ended 31st March, 2025**

I, Nupur Mimani, 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. (Under CIRP w.e.f 27<sup>th</sup> September 2024),
- (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 report,

for the year ended 31st March, 2025 (“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; (Company is under CIRP, as per Regulation 15 (2A) and (2B) of SEBI LODR Regulations, 2015, the provisions of Regulations 17, 18, 19, 20, and 21 are not applicable during the insolvency resolution process period for listed companies undergoing CIRP under the Insolvency Code.)
  - (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;
  - (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,





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(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)	Regulation/ Circular No.	Deviation	Action Taken by	Time period of Action	Detail of Violation	Fine Amount	Observations/Remarks of the Practising Company Secretary (PCS)	Management Response	Remarks
	Regulation 6(1) Appointment of a qualified company secretary as the compliance officer of the Company	6(1)	Non-Compliance	BSE Ltd.	Fine	Imposition of fine and possible demat account freeze for promoters	Rs. 108560	Kindly appoint Company Secretary (CS) and complied with the regulation	The Corporate Insolvency Resolution Process (CIRP) has been initiated against Shree Hanuman Sugar & Industries Limited by order dated 27.09.2024 by the Hon'ble NCLT, Kolkata Bench. With the suspension of the Board, all power vest to RP. RP is in process to comply with the said regulation.	

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





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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.	<b>Secretarial Standards:</b>  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	Refer Note-1 below
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li><li>● All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li></ul>	Yes	Refer Note-2 below
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>● The Listed entity is maintaining a functional website</li><li>● Timely dissemination of the documents/ information under a separate section on the website</li><li>● 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</li></ul>	Yes	-
4.	<b>Disqualification of Director:</b>  None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Refer Note-3 below
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b>  (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 be applicable on the Company



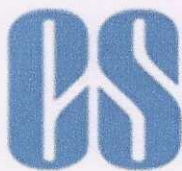


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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
6.	<b>Preservation of Documents:</b>  The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	-
7.	<b>Performance Evaluation:</b>  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.	<b>Related Party Transactions:</b>  (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.	<b>Disclosure of events or information:</b>  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.	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-





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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  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.	<b>Additional Non-compliances, if any:</b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	<ul style="list-style-type: none"><li>No CS appointed during the year under review</li></ul>

**Note:**

1. The Corporate Insolvency Resolution Process (CIRP) has been initiated against Shree Hanuman Sugar & Industries Limited by order dated 27.09.2024 by the Hon'ble NCLT, Kolkata Bench. Pursuant to sub-regulation (2A) and 2(B) in Regulation 15 in LODR, the entire provisions of Regulation 17, 18, 19, 20 and 21, including with regard to holding requisite number of meetings in a year and composition of the Board of Directors, Audit Committee, Nomination and Remuneration Committee, stakeholders Relationship Committee and Risk Management Committee, are not applicable.
2. The Company was undergoing a Corporate Insolvency Resolution Process ("CIRP") since 27.09.2024 and the powers of the Board of Directors are suspended
3. The Company is undergoing Corporate Insolvency Resolution Process ("CIRP") during review period. The powers of the Board of Directors are ~~suspended~~ and are being exercised by Resolution Professional (RP).

Place: Kolkata  
Date: 29/04/2025

Signature:

Name: Nupur Mimani

ACS No.: A37847

C P No.: 16805

Peer review No- 5781/2024

UDIN: A037847G000227443

