



15th May 2025

Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex
Bandra (East), Mumbai – 400 051

Dept. of Corporate Service
BSE Limited
P. J. Towers, Dalal Street
Mumbai – 400 001

NSE Symbol: **RENUKA**

BSE Scrip Code: **532670**

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the financial year ended 31st March 2025

Dear Sir / Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith Annual Secretarial Compliance Report issued by DVD & Associates, Practicing Company Secretary (C.P. No. 6515 and PR No.1164/2021) for the financial year ended 31st March 2025.

You are requested to take the above information on record.

Thanking you,

Yours faithfully,
For Shree Renuka Sugars Limited

Deepak Manerikar
Company Secretary

Encl.: as above

Shree Renuka Sugars Limited

Corporate Office: 7th Floor • Devchand House • Shiv Sagar Estate • Dr. Annie Besant Road • Worli Mumbai 400 018 • Maharashtra • India

P +91 22 2497 7744/4001 1400 **F** +91 22 2497 7747 **E** info@renukasugars.com

Registered Office: 2nd / 3rd Floor, Kanakshree Arcade, CTS No. 10634, JNMC Road, Nehru Nagar, Po: Belagavi- 590 010 • Karnataka • India

P +91 831 2404000 **F** +91 831 2404961

W www.renukasugars.com • Corporate Identification No.: L01542KA1995PLC019046



DVD & ASSOCIATES

Company Secretaries

+ 91 - 9823239397

devendracs@gmail.com

Pune | Mumbai | Kolhapur | Yavatmal | Dubai

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF SHREE RENUKA SUGARS
LIMITED FOR THE YEAR ENDED 31ST MARCH, 2025.**

We, DVD & Associates, have examined:

- (a) all the documents and records made available to us and explanation provided by Shree Renuka Sugars Limited ("the listed entity"). The company is listed at BSE Limited and National Stock Exchange.
- (b) the filings/ submissions made by the listed entity to the stock exchanges.
- (c) website of the listed entity is updated as per the provisions of Listing Regulations,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2025 ("**Review Period**") in respect of compliance with the provisions of:

- I. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under;
- II. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined:

- (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; **[Not applicable during the review period]:**

Pune Office: 3rd Floor, Samarth Building, Plot 14, Pinak Colony, Near Bank of India, Karve Nagar, Pune - 411 052



- (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 during the review period]**;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **[Not applicable during the review period]**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 there under which are applicable to the Company.
- b. The listed entity has taken actions to comply with the observations made in the previous Report as per Annexure B attached,
- c. We further affirm on the basis of the information received and examination of various documents as required by the circulars issued by Stock Exchanges:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/ Remarks by PCS
1	<u>Secretarial Standards:</u> 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	NA
2	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of the board of directors of the listed entities All the policies are in conformity with SEBI Regulations and have been 	Yes	NA



	reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI		
3	<u>Maintenance and disclosures on Website:</u> <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	NA
4	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	NA
5	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	NA
6	<u>Preservation of Documents:</u> 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	NA
7	<u>Performance Evaluation:</u> 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	NA



8	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of the Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	Yes	NA
9	<u>Disclosure of events or information:</u> 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	Yes, except for cases mentioned in Annexure A
10	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	NA
11	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No other actions have 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	Yes	The Company has not received any notices / no action has been taken by SEBI / Stock Exchanges.
12	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of	NA	NA




	chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.		
13	Additional Non-compliances, if any: No additional non-compliances were observed for all SEBI regulation/circular/guidance note etc.	NA	NA

Observations/Remarks by PCS are mandatory if the compliance status is provided as 'No' or 'NA' Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**FOR DVD & ASSOCIATES
COMPANY SECRETARIES**


DEVENDRA DESHPANDE
FCS No. 6099 CP No. 6515
PR NO: 1164/2021
UDIN: F006099G000313604



Place: Pune
Date: 10.05.2025

ANNEXURE A
ANNUAL SECRETARIAL COMPLIANCE REPORT OF SHREE RENUKA SUGARS LIMITED
FOR THE FINANCIAL YEAR ENDED ON 31.03.2025

The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under which are applicable for the Company, except in respect of matters specified below

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/ (Regulations/ Remarks of the Practicing Company Secretary)	Management Response	Remarks
01	Regulation 30 SEBI (LODR) Regulations, 2015 The listed entity shall disclose the outcome of meeting and submission of financial statements of the board of directors to the Exchange(s), within thirty minutes of the closure of the meeting.	Regulation 30 (4)	1 Day	Stock Exchange	A query letter was sent by the stock exchange in respect of the late submission	Delay in submission of Outcome of Board Meeting and Financial Statements	No fine / penalty levied	There was a delay of submission of the Outcome of the Board Meeting and Financial Statements which were approved at the meeting held on 29 th May 2024.	The company had faced internet connectivity issues due to some technical glitches at our end, and hence there was a delay in filing the outcome of the Board meeting and Financial Statements as per Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, in respect of our Board Meeting dated 29 th May 2024. This delay was due to factors beyond our control and hence purely unintentional and without any mala fide intention. It may also be noted that the Board Meeting concluded	Clarification for delay has been submitted to the stock exchange.

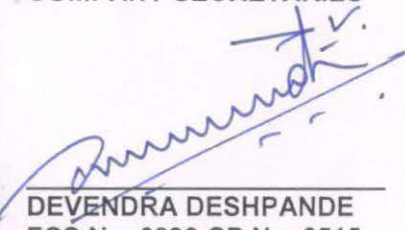


									after trading hours on 29 th May 2024 and hence there was no effect on the price of the securities of the Company due to late filing of the outcome. Further, there was no unpublished price sensitive information shared till the filing of the outcome on the exchanges.	
02	Regulation 30 SEBI (LODR) Regulations, 2015	Regulation 30	The order dated 30 th April 2024 was submitted to Stock Exchange on 1 st August 2024	Observed during the review	No action taken – It was observed during the process of Certification	Delay in submission of disclosure	No fine / penalty levied	There was a delay in submission of Disclosure of order dated 30 th April 2024 passed by State Tax officer (2), Unit 103, Gandhidham	The delay in filing was due to the late receipt of the intimation from the concerned team. We also state that our Company has always been meticulous in complying with the Listing and other SEBI Regulations. This delay was purely unintentional and without any mala fide intention.	NA



03	Regulation 30 SEBI (LODR) Regulations, 2015	Regulation 30	The order dated 5 th August 2024 was submitted to Stock Exchange on 28 th September 2024	Stock Exchange	A query letter was sent by the stock exchange in respect of the late submission	Delay in submission of disclosure	No fine / penalty levied	There was a delay in submission of disclosure in respect of order of State Excise, Parbhani, Maharashtra vide its letter/order No. MLS112024 / 952 dated 5 th August 2024	The delay in filing was due to the late receipt of the intimation from the Pathri plant. We also state that our Company has always been meticulous in complying with the Listing and other SEBI Regulations. This delay was purely unintentional and without any mala fide intention.	The Company have filed revised disclosure citing reason for delay with the stock exchanges.
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FOR DVD & ASSOCIATES
COMPANY SECRETARIES


DEVENDRA DESHPANDE
FCS No. 6099 CP No. 6515
PR NO: 1164/2021
UDIN: F006099G000313604



Place: Pune
Date: 10.05.2025

ANNEXURE B

ANNUAL SECRETARIAL COMPLIANCE REPORT OF SHREE RENUKA SUGARS LIMITED FOR THE FINANCIAL YEAR ENDED ON 31.03.2025

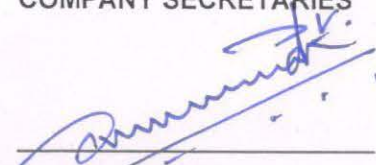
The listed entity has taken the following actions to comply with the observations made in previous reports

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including Specific clause)	Regulation/ Circular No.	Deviations	Actions taken by the listed entity, if any	Type of Action	Details of Violation	Fine Amount	Observation / Remarks of the Practicing Company Secretary	Management Response	Remarks
01	Regulation 60 (2) SEBI (LODR) Regulations, 2015 <i>The listed entity shall give notice in advance of at least seven working days (excluding the date of intimation and the record date) to the recognised stock exchange(s) of the record date or of as many days as the stock exchange(s) may agree to or require specifying the purpose of the record date.</i>	Regulation 60 (2)	2 days	BSE	Fine levied	Delay in furnishing notice.	11800/-	Company paid the penalty amount.	There was an inadvertent delay of 2 days in filing an intimation of record date (Reg. 60(2) of SEBI LODR) for payment of interest/principal obligations of NCDs issued by the Company, for the quarter ended 31st March 2023, with BSE Limited.	The required penalty has been paid by the Company and therefore there is no further action required.



									<p>On 2nd May 2023, BSE Limited issued a letter to the Company informing delay in intimation and instructed to pay the fine amount of Rs. 11,800 (10,000 + 1800 (GST)). The Company has made payment of Rs. 11,800/- to BSE Limited on 16th May 2023.</p>	
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FOR DVD & ASSOCIATES
COMPANY SECRETARIES



DEVENDRA DESHPANDE

FCS No. 6099 CP No. 6515

PR NO: 1164/2021

UDIN: F006099G000313604

Place: Pune

Date: 10.05.2025

