Corporate Office: Chandra Kunj, 3, Pretoria Street, 4th Floor, Kolkata - 700 071 Phones: 2282 1169 (4 Lines), 2282 1183(2 Lines), Fax: (033) 2282 1187/1188 E-mail: esil@nopany.in / shri@nopany.in, Website: www.easternsugar.in CIN: L15421BR1964PLC006630

18th June, 2021

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

The National Stock Exchange of India Limited Exchange Plaza,
Bandra Kurla Complex,
Bandra (East)
Mumbai-400051

Dear Sir,

## **Sub: Annual Secretarial Compliance Report**

We enclosed, the Secretarial Compliance Report of the Company duly issued by Ms. Meena Chowdhary, Practicing Company Secretary, for the financial year ended March 31, 2021.

This is for your information and records.

Thanking you,

Yours faithfully,

For Eastern Sugar & Industries Limited

Shirish Goswami Whole Time Director

Encl: As above

## MEENA CHOWDHARY

Practicing company secretary B.com(H),CS

9/3 Nutan Para Road Liluah,Howrah-711204 Contact.No:8981219475 Email id:meenachowdhary@ymail.com chowdharymeena7@gmail.com

Secretarial compliance report of M/s. Eastern Sugar & Industries Ltd. (CIN: L15421BR1964PLC006630) for the year ended 31st March, 2021

- I, Meena Chowdhary, Practicing Company Secretary have examined:
  - (a) all the documents and records made available to me and explanation provided by M/s. Eastern 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, 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;
- (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 CHOWDHARY

Practicing company secretary B.com(H),CS

9/3 Nutan Para Road Liluah,Howrah-711204 Contact.No:8981219475 Email id:meenachowdhary@ymail.com chowdharymeena7@gmail.com

- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; (Company has 92.77% promoters' shares in demat form but as per SEBI circular SEBI/Cir/ISD/ 05 /2011, the Company should have 100% promoter holding in demat form. Company has informed that remaining promoter's share holding are not yet demat due to that shares are in pledge mode. Company is in process with promoters and respective DPs to demat the remaining promoter's shareholding as soon as possible.
- (j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2015 and circulars/guidelines issued thereunder; (Not Applicable to the Company during the Review Period);

and based on the above examination, I 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:-
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from my 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:

S N	Action taken by	Details of Violatio n	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/remarks of the Practicing Company Secretary, if any.
			Not Applicable	Parameter Commence



## **MEENA CHOWDHARY**

Practicing company secretary B.com(H),CS

9/3 Nutan Para Road Liluah,Howrah-711204 Contact.No:8981219475

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

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

1	of the Practicing	Observations made in the secretarial compliance report for the year ended 31st March 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	Trading approval of shares is pending in BSE and NSE	shares is pending in BSE and NSE	Company is follow up regularly with BSE and NSE for granting inprinciple approval of revocation of suspension.	All compliance & payment is complete for revocation of suspension in BSE and NSE, except Site visit is pending in BSE due to lockdown in some states on account of Covid 19, which Company will complied after resumption from such pandemic, and soon will get in-principle approval for revocation of suspension

Place: Howrah Date: 11/06/21

UDIN:A041084C000450570

CS MEENA CHOWDHARY

PROPRIETRESS
MEMBERSHIP NO 141084

PRACTICING COMPANY SECRETARY
CP NO. 16829