

N.K. RASTOGI & ASSOCIATES

Company Secretary in Practice

03 SHANKAR VIHAR, 2ND FLOOR

VIKAS MARG DELHI - 110092

PH: 011-45201005 E MAIL: naveen@nkrassociate.com

Secretarial Compliance Report of Uttam Sugar Mills Limited for the year ended 31.03.2022

To,
Uttam Sugar Mills Limited
Village Libberheri,
Tehsil Roorkee,
District Haridwar,
Uttarakhand – 247 667

We, M/s N.K. Rastogi & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by Uttam Sugar Mills Limited (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges, **(BSE/NSE)**
- (c) website of the listed entity, **(www.uttamsugar.in)**
- (d) any other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2022 (“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 during the year under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 ; **(Not Applicable during the year under review)**

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 ; **(Not Applicable during the year under review)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 ; **(Not Applicable during the year under review)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 ;

and circulars/ guidelines issued thereunder.

and based on the above examination, I/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 Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
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- (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 my/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 Secretary, if any.
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- (d) The listed entity has taken the following actions to comply with the observations made in previous reports.

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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(e) During the year under review no appointment/ re-appointment/ resignation of statutory auditor of the Company had occurred. The Company has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

**For N.K. RASTOGI & ASSOCIATES
COMPANY SECRETARIES**

**NAVEEN KUMAR
RASTOGI**

Digitally signed by NAVEEN KUMAR RASTOGI
DN: c=IN, postalCode=201016, st=UTTAR PRADESH,
o=NAVEEN KUMAR RASTOGI, ou=Personal,
serialNumber=ab2361a053b07751255162614c03b96818076745
d5c0b646924e9551a39ca1,
pseudoDn=#665d3de6f647a590055644ee6e6761,
2.5.4.20=49353535094010108074631884725197023741107226
d81c3958671d044d, email=NAVEEN@NKRASSOCIATE.COM,
cn=NAVEEN KUMAR RASTOGI
Date: 2022.05.26 18:30:05 +05'30'

Place: DELHI
DATE : 26TH May, 2022

UDIN: F003685D000393030

(NAVEEN K. RASTOGI)
Proprietor
FCS No.: 3685
C P No.: 3785