

# N.K.RASTOGI & ASSOCIATES

## COMPANY SECRETARY IN PRACTICE

03 SHANKAR VIHAR ,2<sup>ND</sup> FLOOR

VIKAS MARG DELHI -110 092

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### **Secretarial Compliance Report of Uttam Sugar Mills Limited for the year ended 31.03.2020**

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, (<http://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 31.03.2020 ("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 ;

- (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:-

<b>Sr. No</b>	<b>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations/Remarks of the Practicing Company Secretary</b>
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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 :

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/remarks of the Practicing Company Secretary, if any.</b>
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- (d) The listed entity has taken the following actions to comply with the observations made in previous reports.

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended 31.03.2020</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
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**For N.K. RASTOGI & ASSOCIATES  
 COMPANY SECRETARIES**

**(NAVEEN K. RASTOGI)**  
**Proprietor**  
**FCS No.: 3685**  
**C P No.: 3785**  
**UDIN F003685B000384208**

Place: 26 June, 2020  
 Date: Delhi