



RANA SUGARS LIMITED

REGD. OFFICE: S.C.0.49-50, SECTOR 8-C, MADHYA MARG CHANDIGARH- 160 009 (INDIA)
CIN: L15322CH1991PLC011537, Website: www.ranasugars.com, E-mail: info@ranagroup.com
TEL.: 0172-2540007, 2549217, 2541904, 2779565, 2773422, FAX: 0172-2546809

RSL/21-22/CS

To,

30th Day of June, 2021

Department of Corporate Services (DCS)
The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001.

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

Ref: Scrip Code: 507490,

Company Symbol: RANASUG

Sub: Annual Secretarial Compliance Report for the Financial Year 2020-21.

Sir/Ma'am,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith Annual Secretarial Compliance Report issued by Mr. Ajay K. Arora (Membership No. 2191 and C. P. No. 993), Practicing Company Secretary for the Financial Year ended March 31, 2021.

You are requested to kindly take the above on your records.

Thanking you,
Yours sincerely,

For RANA SUGARS LIMITED

MANMOHAN K RAINA

Company Secretary cum Compliance Officer

**Secretarial compliance report of Rana Sugars Limited
for the year ended March 31, 2021**

To,

Rana Sugars Limited,
S.C.O. 49-50, Sector 8-C,
Madhya Marg, Chandigarh.

We, A. Arora & Co., Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Rana Sugars Limited ("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 March 31, 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: Not applicable to the company during the Review Period.
- (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 as there was no instance of Buy-Back of its securities 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 as the company has not issued any debt securities 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 as the company has not issued any such securities 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 circulars/ guidelines issued thereunder, 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 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
1.	Regulation 5 of SEBI (Prohibition of Insider Trading) Regulations, 2015	The company has not yet updated the structured digital database of the persons or entities with whom the unpublished price sensitive information is shared.	The company is yet to entirely update the structured digital database of the persons or entities with whom the unpublished price sensitive information is shared. As per the information provided by the management, the process has been initiated. However the execution and updation of the database is intermittently hampered due to ongoing Covid restrictions.

- (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 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.

- (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 31.03.2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The company has entered into non-material related party transactions in	31.03.2020 (FY 2019-20)	The details of the related party transactions entered	The company has since been regular in submitting the details of



	compliance with the provisions of applicable regulations. The company has been further advised that the half yearly details of such related party transactions may be submitted to Stock Exchanges and published on the website in compliance with Regulation 23(9).		into by the company were subsequently reported to the stock exchanges.	the related party transactions on half yearly basis in compliance with Regulation 23 (9) of LODR Regulations and no further default is observed during the review period.
2.	The intimation regarding the order issued by SEBI restricting the Directors and the company from accessing the securities market has not been submitted to the Stock Exchanges.	31.03.2020 (FY 2019-20)	As per the information provided by the company, an appeal has been filed by the company against the said order with Securities Appellate Tribunal.	As per the information provided by the company, an appeal has been filed by the company against the said order with Securities Appellate Tribunal.
3.	The company is not maintaining a structured digital database of the persons or entities with whom the unpublished price sensitive information is shared.	31.03.2020 (FY 2019-20)	The company is yet to take any corrective measure in this regard.	The company is yet to entirely update the structured digital database of the persons or entities with whom the unpublished price sensitive information is shared. As per the information provided by the management, the process has been initiated. However the execution and updation of the database is intermittently hampered due to ongoing Covid restrictions.

Date: 30.06.2021

Place: Chandigarh

UDIN: F002191C000551289

For A. Arora & Co.
Company Secretaries



Ajay K. Arora
M. No. 2191
C. P. No. 993