

SIR SHADI LAL ENTERPRISES LTD.

SHAMLI - 247 776 (UP), CFN: LS1909UP1933PLC146675 - 250032, E-MAIL: udsm_shamli@sify.com

Website: www.sirshadilal.com, Email: cs@sirshadilal.com

Registered Post

To, The Department of Corporate Affairs The BSE Limited 25Th Floor P J Towers, Dalal Street, Mumbai -400001, India

Date: June 12, 2021

Subject: Annual Secretarial Compliance Report

Sir Shadi Lal Enterprises Limited - Scrip Code- 532879

Dear Sir,

Please find enclosed Annual Secretarial Compliance Report dated 9th June, 2021 , Pursuant to the provisions of the SEBI Circular No. CIR/CFD/CMD1/27/2019, issued by Rahul Saini & Co., Company Secretaries for the Financial Year ended 31st March, 2021.

You are requested to take the same on your record.

Thanking You,

Yours Faithfully For Sir Shadi Lal Enterprises Limited

(Ajay Kumar Jain) Company Secretary

UNITS: UPPER DOAB SUGAR MILLS • UNN SUGAR COMPLEX • SHAMLI DISTILLERY & CHEMICAL WORKS

Rahul Saini & Co COMPANY SECRETARIES

3B, II Floor, Maharaja Arcade, Near Nandan Cincma, Garh Road, Meerut Uttar Pradesh 250002 Ph: 0121-2701933 e-mail: mymecrut@hotmail.com Mob +91 9917677600, 8171254777

SECRETARIAL COMPLIANCE REPORT OF SIR SHADIL LAL ENTERPRISES LTD. FOR THE YEAR ENDED MACH 31ST, 2021 [Pursuant to SEBI-CIR/CFD/CMD/1/27/2019 Dated February 08, 2019]

We, Rahul Saini & Co, Company Secretaries, having our office at II Floor, Maharaja Arcade, Near Nandan Cinema, Garh Road, Meerut U.P 250002 have examined:

(a) All the documents and reports made available to us and explanations provided by Sir Shadi Lal Enterprises Ltd. ("the listed entity");

(b) The filings/ submissions made by the listed entity to the stock exchanges;

(d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31-03-2021 ("Review Period") in respect of compliances with the provisions of:

The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and

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, guidel; ines issued thereunder have been examined include:-

Securities and Exchange Board of India (Listing Obligations and Disclosure (a) Requirements) Regulations, 2015;

Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

(not attaracted during year under review)

Securities and Exchange Board of India (Substantial Aqusition of Shares and Takeovers) Regulations, 2011;

(d) Securities and Exchange Board of India (Buy Back of Securities) Regulations, 2018;

(not attaracted during year under review)

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (not attaracted during year under review)

Securities and Exchange Board of India (Issue and Listing of Debt Securities) (f)

Regulations, 2018; (not attaracted during year under review) (g) Gecurities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (not attaracted during year under review)

h) Securities and Exchange Board of India (Prohibition of Insider Trading)

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:-

No.	Compliance (Regulations, guidelines including circulars clause)	Requirements	Observations and remarks of the Practising Company
1			Secretary

(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 observation of those records.

(c) The Following are details of action 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 issuedthereunder:

Sr. No.	Action taken by	Details of Violation		Observations and remarks of the Practsing 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:

	Practising Company	Observations made in the Secretarial Compliance Report for the year ended March 31 st , 2020	listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
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Place: Meerut (U.P)
Date: 09-06-2021



For Rahul Saini & Co COMPANY SECRETARIES

Rahul Saini Propritor C.P No: 7009 Membership No: ACS 16716