

## General information about company

Scrip code	532102
NSE Symbol	NOTLISTED
MSEI Symbol	NOTLISTED
ISIN	INE948G01019
Name of the entity	SBEC Sugar Limited
Date of start of financial year	01-04-2023
Date of end of financial year	31-03-2024
Reporting Quarter	Yearly
Date of Report	31-03-2024
Risk management committee	Not Applicable
Market Capitalisation as per immediate previous Financial Year	Top 2000 listed entities

## Composition of Board

Title (Mr / Ms)	Name of the Director	DIN	Category 1 of directors	Category 2 of directors	Date of Birth	Whether the director is disqualified?	Whether special resolution passed?	Date of passing special resolution	Initial Date of appointment	Date of Re-appointment	Tenure of director (in months)	No of Directorship in listed entities including this listed entity	No of Independent Directorship in listed entities including this listed entity	Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity	No of post of Chairperson in Audit/ Stakeholder Committee held in listed entities including this listed entity
Mr	UMESH KUMAR MODI	00002757	Non-Executive - Non Independent Director	Chairperson	05-03-1951	No	NA		03-02-1995			2	0	1	0
Mrs	KUMKUM MODI	00522904	Non-Executive - Non Independent Director	Not Applicable	19-01-1951	No	NA		26-05-2000			2	0	0	0
Mr	ABHISHEK MODI	00002798	Non-Executive - Non Independent Director	Not Applicable	22-12-1975	No	NA		13-05-1994	06-11-2023		2	0	0	0
Mr	JAYESH MODI	02849637	Non-Executive - Non Independent Director	Not Applicable	14-11-1991	No	NA		30-09-2010			2	0	0	0
Mr	VIJAY KUMAR MODI	00004606	Non-Executive - Non Independent Director	Not Applicable	01-02-1950	No	Yes	23-09-2023	06-02-2015	01-09-2023		3	1	6	4
Mr	NARAYAN PRAKASH BANSAL	00010587	Non-Executive - Independent Director	Not Applicable	31-03-1950	No	Yes	29-09-2022	29-08-2017	29-08-2022	79.03	1	1	2	0
Mrs	Mohi Kumari	09696682	Non-Executive - Independent Director	Not Applicable	07-08-1986	No	NA		16-08-2022	16-08-2022	19.16	1	1	0	0
Mr	Anirudh Kumar Modi	01751260	Non-Executive - Independent Director	Not Applicable	27-09-1977	No	NA		01-09-2023	01-09-2023	7.00	2	2	6	1
Mr	AJAY KUMAR AGGARWAL	00632288	Non-Executive - Independent Director	Not Applicable	20-07-1960	No	NA		01-09-2023	01-09-2023	7.00	2	2	0	0
Mr	PRAMOD KUMAR GUPTA	10337571	Non-Executive - Independent Director	Not Applicable	04-01-1950	No	Yes	28-12-2023	27-11-2023	27-11-2023	4.04	2	2	4	0

## **Composition of Audit Committee**

Whether the Audit Committee has a Regular Chairperson					Yes
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment
1	01751260	Anirudh Kumar Modi	Non-Executive - Independent Director	Chairperson	01-09-2023
2	00004606	VIJAY KUMAR MODI	Non-Executive - Non Independent Director	Member	14-11-2016
3	10337571	PRAMOD KUMAR GUPTA	Non-Executive - Independent Director	Member	27-11-2023
4	00010587	NARAYAN PRAKASH BANSAL	Non-Executive - Independent Director	Member	25-05-2019

## **Composition of Nomination & Remuneration Committee**

Whether the Nomination and remuneration committee has a Regular Chairperson					Yes
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment
1	10337571	PRAMOD KUMAR GUPTA	Non-Executive - Independent Director	Chairperson	27-11-2023
2	00004606	VIJAY KUMAR MODI	Non-Executive - Non Independent Director	Member	07-04-2015
3	00010587	NARAYAN PRAKASH BANSAL	Non-Executive - Independent Director	Member	28-11-2014

## **Composition of Stakeholder Relationship Committee**

Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment
1	00004606	VIJAY KUMAR MODI	Non-Executive - Non Independent Director	Chairperson	11-02-2021
2	10337571	PRAMOD KUMAR GUPTA	Non-Executive - Independent Director	Member	27-11-2023
3	00010587	NARAYAN PRAKASH BANSAL	Non-Executive - Independent Director	Member	28-11-2014

### Annexure 1

#### III. Meeting of Board of Directors

Disclosure of notes on meeting of board of directors explanatory		<a href="#">Add Notes</a>					
Sr	Date(s) of meeting (Enter dates of Previous quarter and Current quarter in chronological order)	Maximum gap between any two consecutive (in number of days)	Notes for not providing Date	Whether requirement of Quorum met (Yes/No)	Total Number of Directors as on date of the meeting	Number of Directors present* (All directors including Independent Director)	No. of Independent Directors attending the meeting*
<a href="#">Add</a> <a href="#">Delete</a>							
1	06-11-2023		<a href="#">Add Notes</a>	Yes	10	9	4
2	25-01-2024	79	<a href="#">Add Notes</a>	Yes	10	5	4
3	10-02-2024	15	<a href="#">Add Notes</a>	Yes	10	5	3
4	14-03-2024	32	<a href="#">Add Notes</a>	Yes	10	4	3

### Annexure 1

#### IV. Meeting of Committees

Disclosure of notes on meeting of committees explanatory		<a href="#">Add Notes</a>								
Sr	Name of Committee	Date(s) of meeting (Enter dates of Previous quarter and Current quarter in chronological order)	Maximum gap between any two consecutive (in number of days)	Name of other committee	Reason for not providing date	Whether requirement of Quorum met (Yes/No)	Total Number of Directors in the Committee as on date of the meeting	Number of Directors Present (All Directors including Independent Director)	No. of Independent Directors attending the meeting*	No. of members attending the meeting (other than Board of Directors)
<a href="#">Add</a> <a href="#">Delete</a>										
1	Audit Committee	06-11-2023			<a href="#">Add Notes</a>	Yes	5	4	3	0
2	Audit Committee	25-01-2024	79		<a href="#">Add Notes</a>	Yes	4	4	3	0
3	Audit Committee	10-02-2024	15		<a href="#">Add Notes</a>	Yes	4	4	3	0
4	Audit Committee	14-03-2024	32		<a href="#">Add Notes</a>	Yes	4	4	3	0
5	Other Committee	08-01-2024		Share Transfer Committee	<a href="#">Add Notes</a>	Yes	4	2	1	0
6	Other Committee	17-01-2024		8) Share Transfer Committee	<a href="#">Add Notes</a>	Yes	4	2	1	0

Details of Cyber security incidence		
Whether as per Regulation 27(2)(ba) of SEBI (LODR) Regulations, 2015 there has been cyber security incidents or breaches or loss of data or documents during the quarter		No
Other details of cyber security incidence or breaches or loss of data event		
Number of cyber security incidence or breaches or loss of data event occurred during the quarter		
<b>Sr.</b>	<b>Date of the event</b>	<b>Brief details of the event</b>

Annexure 1			
V. Related Party Transactions			
Sr	Subject	Compliance status (Yes/No/NA)	If status is "No" details of non-compliance may be given here.
1	Whether prior approval of audit committee obtained	Yes	
2	Whether shareholder approval obtained for material RPT	Yes	
3	Whether details of RPT entered into pursuant to omnibus approval have been reviewed by Audit Committee	Yes	
Disclosure of notes on related party transactions			
Disclosure of notes of material transaction with related party			

Annexure 1		
VI. Affirmations		
Sr	Subject	Compliance status (Yes/No)
1	The composition of Board of Directors is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015	Yes
2	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015 <b>a. Audit Committee</b>	Yes
3	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. <b>b. Nomination &amp; remuneration committee</b>	Yes
4	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. <b>c. Stakeholders relationship committee</b>	Yes
5	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. <b>d. Risk management committee (applicable to the top 1000 listed entities)</b>	NA
6	The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	Yes
7	The meetings of the board of directors and the above committees have been conducted in the manner as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	Yes
8	This report and/or the report submitted in the previous quarter has been placed before Board of Directors.	Yes
9	<b>Any comments/observations/advice of Board of Directors may be mentioned here:</b>	<a href="#">Add Notes</a>

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Annexure 1		
Sr	Subject	Compliance status
1	Name of signatory	Ankit K. Srivastava
2	Designation	Company Secretary and Compliance Officer

**Annexure II**

**Annexure II to be submitted by listed entity at the end of the financial year (for the whole of financial year)**

**I. Disclosure on website in terms of Listing Regulations**

Sr	Item	Compliance status (Yes/No/NA)	If status is "No" details of non-compliance may be given here.	Web address
1	Details of business	Yes		www.sbecsugar.com
2	Terms and conditions of appointment of independent directors	Yes		www.sbecsugar.com
3	Composition of various committees of board of directors	Yes		www.sbecsugar.com
4	Code of conduct of board of directors and senior management personnel	Yes		www.sbecsugar.com
5	Details of establishment of vigil mechanism/ Whistle Blower policy	Yes		www.sbecsugar.com
6	Criteria of making payments to non-executive directors	Yes		www.sbecsugar.com
7	Policy on dealing with related party transactions	Yes		www.sbecsugar.com
8	Policy for determining 'material' subsidiaries	Yes		www.sbecsugar.com
9	Details of familiarization programmes imparted to independent directors	Yes		www.sbecsugar.com
10	Email address for grievance redressal and other relevant details	Yes		www.sbecsugar.com
11	Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances	Yes		www.sbecsugar.com
12	Financial results	Yes		www.sbecsugar.com
13	Shareholding pattern	Yes		www.sbecsugar.com
14	Details of agreements entered into with the media companies and/or their associates	NA		
15.1	Schedule of analyst or institutional investor meet and presentations made by the listed entity to analysts or institutional investors simultaneously with submission to stock exchange	NA		
15.2	Audio or video recordings and transcripts of post earnings/quarterly calls	NA		
16	New name and the old name of the listed entity	NA		
17	Advertisements as per regulation 47 (1)	Yes		www.sbecsugar.com
18	Credit rating or revision in credit rating obtained	NA		
19	Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year	Yes		www.sbecsugar.com
20	Secretarial Compliance Report	Yes		www.sbecsugar.com
21	Materiality Policy as per Regulation 30 (4)	Yes		www.sbecsugar.com
22	Disclosure of contact details of KMP who are authorized for the purpose of determining materiality as required under regulation 30(5)	Yes		www.sbecsugar.com
23	Disclosures under regulation 30(8)	Yes		www.sbecsugar.com
24	Statements of deviation(s) or variations(s) as specified in regulation 32	NA		
25	Dividend Distribution policy as per Regulation 43A(1)	NA		
26	Annual return as provided under section 92 of the Companies Act, 2013	Yes		www.sbecsugar.com
27	Confirmation that the above disclosures are in a separate section as specified in regulation 46(2)	Yes		www.sbecsugar.com
28	Compliance with regulation 46(3) with respect to accuracy of disclosures on the website and timely updating	Yes		www.sbecsugar.com
29	Disclosure of notes on website in terms of Listing Regulations explanatory [Text Block]		Add Notes	

Sr	Particulars	Regulation Number	Compliance status (Yes/No/NA)
1	Independent director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility'	16(1)(b) & 25(6)	Yes
2	Board composition	17(1), 17(1A) & 17(1C), 17(1D) & 17(1E)	Yes
3	Meeting of Board of directors	17(2)	Yes
4	Quorum of Board meeting	17(2A)	Yes
5	Review of Compliance Reports	17(3)	Yes
6	Plans for orderly succession for appointments	17(4)	Yes
7	Code of Conduct	17(5)	Yes
8	Fees/compensation	17(6)	Yes
9	Minimum Information	17(7)	Yes
10	Compliance Certificate	17(8)	Yes
11	Risk Assessment & Management	17(9)	Yes
12	Performance Evaluation of Independent Directors	17(10)	Yes
13	Recommendation of Board	17(11)	Yes
14	Maximum number of Directorships	17A	Yes
15	Composition of Audit Committee	18(1)	Yes
16	Meeting of Audit Committee	18(2)	Yes
17	Role of Audit Committee and information to be reviewed by the audit committee	18(3)	Yes
18	Composition of nomination & remuneration committee	19(1) & (2)	Yes
19	Quorum of Nomination and Remuneration Committee meeting	19(2A)	Yes
20	Meeting of Nomination and Remuneration Committee	19(3A)	Yes
21	Role of Nomination and Remuneration Committee	19(4)	Yes
22	Composition of Stakeholder Relationship Committee	20(1), 20(2) & 20(2A)	Yes
23	Meeting of Stakeholders Relationship Committee	20(3A)	Yes
24	Role of Stakeholders Relationship Committee	20(4)	Yes
25	Composition and role of risk management committee	21(1),(2),(3),(4)	NA
26	Meeting of Risk Management Committee	21(3A)	NA
27	Quorum of Risk Management Committee meeting	21(3B)	NA
28	Gap between the meetings of the Risk Management Committee	21(3C)	NA
29	Vigil Mechanism	22	Yes
30	Policy for related party Transaction	23(1), (1A), (5), (6), & (8)	Yes
31	Prior or Omnibus approval of Audit Committee for all related party transactions	23(2), (3)	Yes
32	Approval for material related party transactions	23(4)	Yes
33	Disclosure of related party transactions on consolidated basis	23(9)	Yes
34	Composition of Board of Directors of unlisted material Subsidiary	24(1)	Yes
35	Other Corporate Governance requirements with respect to subsidiary of listed entity	24(2),(3),(4),(5) & (6)	Yes
36	Alternate Director to Independent Director	25(1)	NA
37	Maximum Tenure	25(2)	Yes
38	Appointment, Re-appointment or removal of an Independent Director through special resolution or the alternate mechanism	25(2A)	Yes
39	Meeting of independent directors	25(3) & (4)	Yes
40	Familiarization of independent directors	25(7)	Yes
41	Declaration from Independent Director	25(8) & (9)	Yes
42	Directors and Officers insurance	25(10)	NA
43	Confirmation with respect to appointment of Independent Directors who resigned from the listed entity	25(11)	Yes
44	Memberships in Committees	26(1)	Yes
45	Affirmation with compliance to code of conduct from members of Board of Directors and Senior management personnel	26(3)	Yes
46	Disclosure of Shareholding by Non-Executive Directors	26(4)	NA
47	Policy with respect to Obligations of directors and senior management	26(2) & 26(5)	Yes
48	Approval of the Board and shareholders for compensation or profit sharing in connection with dealings in the securities of the listed entity	26(6)	Yes
49	Vacancies in respect Key Managerial Personnel	26A(1) & 26A(2)	Yes

Annexure II		
III. Affirmations		
Sr	Particulars	Compliance status (Yes/No/NA)
1	The Listed Entity has approved Material Subsidiary Policy and the Corporate Governance requirements with respect to subsidiary of Listed Entity have been complied	Yes
Any other information to be provided		<a href="#">Add Notes</a>

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Annexure II		
1	Name of signatory	Ankit K. Srivastava
2	Designation	Company Secretary and Compliance Officer

Additional Half yearly Disclosure			
Applicability of disclosure	Applicable		
Reason for Non Applicability	<a href="#">Add Notes</a>		
I. Disclosure of Loans/ guarantees/comfort letters /securities etc.refer note below		The Figure should be mentioned in Actual INR only	
(A) Any loan or any other form of debt advanced by the listed entity directly or indirectly to			
<b>Entity</b>	<b>Aggregate amount advanced during six months</b>	<b>Balance outstanding at the end of six months</b>	
Promoter or any other entity controlled by them	0.00	0.00	
Promoter Group or any other entity controlled by them	0.00	0.00	
Directors (including relatives) or any other entity controlled by them	0.00	0.00	
KMPs or any other entity controlled by them	0.00	0.00	
(B) Any guarantee / comfort letter (by whatever name called) provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed By			
<b>Entity</b>	<b>Type (guarantee, comfort letter etc.)</b>	<b>Aggregate amount of issuance during six months</b>	<b>Balance outstanding at the end of six months(taking into account any invocation)</b>
Promoter or any other entity controlled by them		0	0.00
Promoter Group or any other entity controlled by them	Corporate Guarantee	0.00	62500000.00
Directors (including relatives) or any other entity controlled by them		0	0.00
KMPs or any other entity controlled by them		0	0.00
(C) Any security provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by			
<b>Entity</b>	<b>Type of security (cash, shares etc.)</b>	<b>Aggregate value of security provided during six months</b>	<b>Balance outstanding at the end of six months</b>
Promoter or any other entity controlled by them		0	0.00
Promoter Group or any other entity controlled by them		0	0.00
Directors (including relatives) or any other entity controlled by them		0	0.00
KMPs or any other entity controlled by them		0	0.00
(D) Additional Information	<a href="#">Add Notes</a>		
II. Affirmations			
<b>Affirmations</b>		<b>Compliance Status</b>	<b>Company Remarks</b>
All loans (or other form of debt), guarantees, comfort letters (by whatever name called) or securities in connection with any loan(s) (or other form of debt) given directly or indirectly by the listed entity		Yes	<a href="#">Add Notes</a>
<b>Name</b>	A. K. Goel		
<b>Designation</b>	CFO		
<b>Place</b>	New Delhi		
<b>Date</b>	19-04-2024		

<b>Signatory Details</b>	
<b>Name of signatory</b>	Ankit K. Srivastava
<b>Designation of person</b>	Company Secretary and Compliance Officer
<b>Place</b>	New Delhi
<b>Date</b>	19-04-2024