

The Sandur Manganese & Iron Ores Limited

(An ISO 9001:2015; ISO 14001:2015 and OHSAS 18001:2007 certified company)
CIN:L85110KA1954PLC000759; Website: www.sandurgroup.com

REGISTERED OFFICE

'SATYALAYA', No.266
Ward No.1, Palace Road
Sandur - 583 119, Ballari District,
Karnataka, India
Telephone: +91 08395 260301
Fax: +91 8395 260473



CORPORATE OFFICE

'SANDUR HOUSE', No.9,
Bellary Road, Sadashivanagar
Bengaluru - 560 080,
Karnataka, India
Telephone: +91 80 4152 0176 / 179
Fax: +91 80 4547 3000

29 June 2021

The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai - 400 001

Dear Sir/Madam,

Sub - Sub: Annual Secretarial Compliance Report for the year ended 31 March 2021

With reference 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 the Annual Secretarial Compliance Report for the year ended March 31, 2021 issued by the Secretarial Auditors of the Company.

Kindly take the same in your records.

Thanking you.

Yours Sincerely,
for The Sandur Manganese & Iron Ores Limited

Bijan Kumar Dash
Company Secretary &
Compliance Officer



MINES OFFICE: Deogiri - 583112, Sandur Taluk, Ballari District
Tel: +91 8395 271025 / 28 / 29 / 40; Fax: +91 8395 271066

PLANT OFFICE: Metal & Ferroalloy Plant, Vyasankere, Mariyammanahalli - 583 222, Hosapete Taluk, Ballari District
Tel: +91 8394 244450 / 244335



ND SATISH

Practicing Company Secretary

No. 6/12, Gurappa Avenue,
Primrose Road,
Bangalore- 560 040
Mobile: 08971403035, 09480709752
e-mail: cs.ndsatish@gmail.com

SECRETARIAL COMPLIANCE REPORT

of

THE SANDUR MANGANESE & IRON ORES LIMITED

(CIN L85110KA1954PLC000759)

for the year ended 31 March 2021

I, have examined,

- a) all the documents and records made available to us and explanation provided by **The Sandur Manganese & Iron Ores Limited (hereinafter referred as '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 **31st March 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 ("SEBI (LODR Regulations, 2015");
- b. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (there were no events requiring compliance during the review period);



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- 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 (there were no events requiring compliance during the review period);
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (there were no events requiring compliance during the review period);
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (there were no events requiring compliance during the review period);
- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (there were no events requiring compliance during the review period);
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic. We hereby report that, during the Review Period. Based on the above examination, I 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;
- 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 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 BSE Ltd., (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:



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Sr. No.	Action taken by	Details violation	of	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practising Company Secretary, if any.
Not applicable					

d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Observations made in the Secretarial Compliance Report for the year ended 31 st March 2020	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1	<i>The Company has delayed by six days submission of Secretarial Compliance Report with BSE Ltd in terms of Regulation 24A of SEBI (LODR) Regulations, 2015 read with Circular No. CIR/CFD/CMD 1/27/2019 dated 08 February 2019.</i>	<i>The Company has delayed by six days submission of Secretarial Compliance Report with BSE Ltd in terms of Regulation 24A of SEBI (LODR) Regulations, 2015 read with Circular No. CIR/CFD/CMD1/27/2019 dated 08 February 2019.</i>	<i>The Secretarial Compliance Report has been submitted by Company with BSE Ltd., on 06 June 2019.</i>	<i>It is submitted that this being a new compliance requirement the delay in submission was inadvertent and unintentional. The acknowledgment duly issued by BSE Ltd after submission of Secretarial Compliance Report on 06 June 2019</i>

Signature: NERLAHADDA
ND Satish DATTATREYA SATISH
Practising Company Secretary
FCS No.: 10003 C.P. No.: 12400
UDIN: F010003C000526794

Digitally signed by
NERLAHADDA
DATTATREYA SATISH
Date: 2021.06.28
19:58:48 +05'30'

Date: 28 June 2021
Place: Bengaluru