



**COMPLIANCE CERTIFICATE FOR THE PERIOD STARTING FROM APRIL 1st,  
2025, TO NOVEMBER 04th, 2025**

(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading)  
Regulations, 2015)

I, **Chander Kant**, Proprietor of M/s Chandar Kant & Associates, Company Secretaries appointed by **Simbhaoli Sugars Limited**, am aware of the compliance requirement of Structured Digital Database (SDD) pursuant to provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations) and I certify based on verification and information provided by the Company that:

1. The Company has a Structured Digital Database in place.
2. Control exists as to who can access the SDD.
3. All the UPSI disseminated in the period i.e. **April 01, 2025, To November 04, 2025**, have been captured in the Database.
4. The system has captured nature of UPSI along with date and time.
5. The database has been maintained internally, and an audit trail is maintained.
6. The database is non-tamperable and has the capability to maintain the records for 8 years.)

As per the information provided by the Company, the Company was required to capture five number of events during the abovesaid period and has captured five numbers of the said required events.

Note: - Simbhaoli Sugars Limited (CIN: L15122UP2011PLC044210) is presently undergoing Corporate Insolvency resolution process (CIRP) with effect from July 11, 2024. The Hon'ble NCLT, Allahabad bench had appointed Mr. Anurag Goel, as IRP of the Company.



I would like to report that the following non-compliance(s) were observed in the said period and the remedial action(s) taken along with timelines in this regard:

Annual Secretarial Compliance Report for FY 2024-25 was filed with delay by the Company during the period.

Consolidated Financial Results for the Financial Year 2024-25 has not been filed by the Company under Regulation 33 of SEBI (LODR) Regulations, 2015.

Financial Results for the quarter ended on June 30, 2025, was filed with delay under Regulation 33 of SEBI (LODR) Regulations, 2015.

The Company's Annual General Meeting has not been held by the Company as Company is under Corporate Insolvency Resolution Process (CIRP) pursuant to the order of the Hon'ble NCLT, Allahabad Bench dated July 11, 2024.

For Chander Kant & Associates  
Company Secretaries

  


**CS Chander Kant**  
Proprietor  
COP: 13821  
MRN: F10570  
UDIN: F010570G001753300

Date: 04.11.2025  
Place: Delhi