| General information about company                              |  |  |  |  |  |  |
|--|--|--|--|--|--|--|
| Scrip code   | 504918                                     |  |  |  |  |  |
| NSE Symbol   | NA   |  |  |  |  |  |
| MSEI Symbol  | NA   |  |  |  |  |  |
| ISIN   | INE149K01016                               |  |  |  |  |  |
| Name of the entity   | THE SANDUR MANGANESE AND IRON ORES LIMITED |  |  |  |  |  |
| Date of start of financial year                                | 01-04-2021                                 |  |  |  |  |  |
| Date of end of financial year                                  | 31-03-2022                                 |  |  |  |  |  |
| Reporting Quarter  | Yearly                                     |  |  |  |  |  |
| Date of Report   | 31-03-2022                                 |  |  |  |  |  |
| Risk management committee                                      | Applicable                                 |  |  |  |  |  |
| Market Capitalisation as per immediate previous Financial Year | Top 1000 listed entities                   |  |  |  |  |  |

|    |   |  |            |          |   |   |  |  |  | Anne                                 | exure I                              |               |          |       |   |   |   |   |  |  |
|----|---|--|------------|----------|---|---|--|--|--|--------------------------------------|--------------------------------------|---------------|----------|-------|---|---|---|---|--|--|
|    |   |  |            |          |   |   | Annexu   | re I   | to be subn   | nitted by                            | v listed en                          | tity on qu    | arterly  | basis |   |   |   |   |  |  |
|    | I. Composition of Board of Directors  |  |            |          |   |   |  |  |  |                                      |                                      |               |          |       |   |   |   |   |  |  |
|    |   |  |            |          |   |   | Disclosu   | re of n  | otes on com  | position o                           | f board of o                         | lirectors exp | lanatory |       |   |   |   |   |  |  |
|    |   |  |            |          |   |   |  |  |  |                                      |                                      | Regular Cha   |          |       |   |   |   |   |  |  |
| L  |   |  |            |          |   |   |  |  | Whe  | ther Chair                           | person is re                         | lated to MD   | or CEO   | No    |   |   |   |   |  |  |
| Sr | Title (Mr Name of the Office of Asserting Mr. Name of the Office of Mr. Name of the Office of Asserting Mr. Name of the Office of Office of Asserting Mr. Name of the Office of |  |            |          | Tenure<br>of<br>director<br>(in<br>months)            | No of<br>Directorship<br>in listed<br>entities<br>including<br>this listed<br>entity (Refe<br>Regulation<br>17A of<br>Listing<br>Regulations) | No of<br>Independent<br>Directorship<br>in listed<br>entities<br>including<br>this listed<br>entity<br>(Refer<br>Regulation<br>17A(1) of<br>Listing<br>Regulations | Number of<br>memberships<br>in Audit/<br>Stakeholder<br>Committee(s)<br>including this<br>listed entity<br>(Refer<br>Regulation<br>26(1) of<br>Listing<br>Regulations) | No of post<br>of<br>Chairperson<br>in Audit/<br>Stakeholder<br>Committee<br>held in listed<br>entities<br>including<br>this listed<br>entity (Refer<br>Regulation<br>26(1) of<br>Listing<br>Regulations) | Notes for<br>not<br>providing<br>PAN | Notes for<br>not<br>providing<br>DIN |               |          |       |   |   |   |   |  |  |
| 1  | Mr  | Thoniparambil<br>Raghavan<br>Raghunandan | ABXPR5016R | 03637265 | Non-<br>Executive -<br>Non<br>Independent<br>Director | Chairperson   |  | 06-<br>10-<br>1959   | NA   |                                      | 28-05-2016                           |               |          |       | 1 | 0 | 1 | 0 |  |  |
| 2  | Mr  | Bahirji A<br>Ghorpade                    | BGXPG3061R | 08452844 | Executive<br>Director                                 | Not<br>Applicable   | CEO-<br>MD   | 22-<br>05-<br>1995   | NA   |                                      | 01-04-2020                           |               |          |       | 1 | 0 | 1 | 0 |  |  |
| 3  | Mr  | Sattiraju<br>Seshagiri Rao               | ABBPR6254R | 00150816 | Non-<br>Executive -<br>Independent<br>Director        | Not<br>Applicable   |  | 11-<br>11-<br>1947   | NA   |                                      | 01-09-2013                           | 01-04-2019    |          | 36    | 1 | 1 | 3 | 2 |  |  |
| 4  | Mr  | Gururaj<br>Pandurang<br>Kundargi         | ACPPK5726N | 02256516 | Non-<br>Executive -<br>Independent<br>Director        | Not<br>Applicable   |  | 15-<br>08-<br>1956   | NA   |                                      | 12-11-2016                           | 12-11-2021    |          | 65    | 2 | 2 | 3 | 1 |  |  |

|    |                          |   |            |          |   |                               |                               |                     | I. Comp  | osition                                     | of Board                          | of Directo                 | ors               |  |  |  |  |  |                                      |                                      |
|----|--------------------------|---|------------|----------|---|-------------------------------|-------------------------------|---------------------|--|---|-----------------------------------|----------------------------|-------------------|--|--|--|--|--|--------------------------------------|--------------------------------------|
|    |                          |   |            |          |   |                               | Disc                          | losur               | e of notes or  | ı composi                                   | ition of boa                      | rd of directo              | ors expla         | natory                                     |  |  |  |  |                                      |                                      |
|    |                          | Whether the listed entity has a Regular Chairperson |            |          |   |                               |                               |                     |  |   |                                   |                            |                   |  |  |  |  |  |                                      |                                      |
| Sr | Title<br>(Mr<br>/<br>Ms) | Name of<br>the<br>Director                          | PAN        | DIN      | Category 1<br>of directors                            | Category 2<br>of<br>directors | Category<br>3 of<br>directors | Date<br>of<br>Birth | Whether<br>special<br>resolution<br>passed?<br>[Refer Reg.<br>17(1A) of<br>Listing<br>Regulations] | Date of<br>passing<br>special<br>resolution | Initial Date<br>of<br>appointment | Date of Re-<br>appointment | Date of cessation | Tenure<br>of<br>director<br>(in<br>months) | No of<br>Directorship<br>in listed<br>entities<br>including<br>this listed<br>entity (Refer<br>Regulation<br>gulation<br>Listing<br>Regulations) | No of<br>Independent<br>Directorship<br>in listed<br>entities<br>including<br>this listed<br>entity<br>(Refer<br>Regulation<br>17A(1) of<br>Listing<br>Regulations | Number of<br>memberships<br>in Audit/<br>Stakeholder<br>Committee(s)<br>including this<br>listed entity<br>(Refer<br>Regulation<br>26(1) of<br>Listing<br>Regulations) | No of post<br>of<br>Chairperson<br>in Audit/<br>Stakeholder<br>Committee<br>held in listed<br>entities<br>including<br>including<br>the listed<br>entity (Refer<br>Regulation<br>26(1) of<br>Listing<br>Regulations) | Notes for<br>not<br>providing<br>PAN | Notes for<br>not<br>providing<br>DIN |
| 5  | Mrs                      | Latha<br>Pillai                                     | AAMPL8513F | 08378473 | Non-<br>Executive -<br>Independent<br>Director        | Not<br>Applicable             |                               | 18-<br>10-<br>1959  | NA   |   | 08-03-2019                        |                            |                   | 37   | 1  | 1  | 2  | 0  |                                      |                                      |
| 6  | Mr                       | H.L.Shah  | AWRPS0722J | 00996888 | Non-<br>Executive -<br>Non<br>Independent<br>Director | Not<br>Applicable             |                               | 25-<br>11-<br>1953  | NA   |   | 27-05-2019                        |                            |                   |  | 1  | 0  | 2  | 0  |                                      |                                      |
| 7  | Mr                       | Jagadish<br>Rao Kote                                | AASPR6414P | 00521065 | Non-<br>Executive -<br>Independent<br>Director        | Not<br>Applicable             |                               | 15-<br>05-<br>1957  | NA   |   | 27-05-2019                        |                            |                   | 35   | 1  | 1  | 2  | 1  |                                      |                                      |
| 8  | Mr                       | Md<br>Abdul<br>Saleem                               | ASOPS5650E | 00061497 | Executive<br>Director                                 | Not<br>Applicable             |                               | 28-<br>04-<br>1974  | NA   |   | 01-04-2020                        |                            |                   |  | 1  | 0  | 0  | 0  |                                      |                                      |

| Αu | ıdit Commi    | ttee Details                          |   |                            |                        |                      |         |
|----|---------------|---------------------------------------|---|----------------------------|------------------------|----------------------|---------|
|    |               | Wheth                                 | ner the Audit Committee has a Re            | gular Chairperson          | Yes                    |                      |         |
| Sr | DIN<br>Number | Name of Committee<br>members          | Category 1 of directors                     | Category 2 of<br>directors | Date of<br>Appointment | Date of<br>Cessation | Remarks |
| 1  | 02256516      | Gururaj Pandurang<br>Kundargi         | Non-Executive - Independent<br>Director     | Chairperson                | 04-02-2017             |                      |         |
| 2  | 00150816      | Sattiraju Seshagiri Rao               | Non-Executive - Independent<br>Director     | Member                     | 01-09-2013             |                      |         |
| 3  | 03637265      | Thoniparambil Raghavan<br>Raghunandan | Non-Executive - Non<br>Independent Director | Member                     | 01-02-2020             |                      |         |
| 4  | 08378473      | Latha Pillai                          | Non-Executive - Independent<br>Director     | Member                     | 01-02-2020             |                      |         |
| 5  | 00996888      | H.L.Shah                              | Non-Executive - Non<br>Independent Director | Member                     | 28-05-2019             |                      |         |
| 6  | 00521065      | Jagadish Rao Kote                     | Non-Executive - Independent<br>Director     | Member                     | 28-05-2019             |                      |         |

| No | Nomination and remuneration committee |   |   |                            |                        |                      |         |  |  |  |
|----|---------------------------------------|---|---|----------------------------|------------------------|----------------------|---------|--|--|--|
|    |                                       | Whether the Nomination and remuneration committee has a Regular Chairperson Yes |   |                            |                        |                      |         |  |  |  |
| Sr | DIN<br>Number                         | Name of Committee<br>members  | Category 1 of directors                     | Category 2 of<br>directors | Date of<br>Appointment | Date of<br>Cessation | Remarks |  |  |  |
| 1  | 08378473                              | Latha Pillai  | Non-Executive - Independent<br>Director     | Chairperson                | 28-05-2019             |                      |         |  |  |  |
| 2  | 00150816                              | Sattiraju Seshagiri Rao   | Non-Executive - Independent<br>Director     | Member                     | 31-08-2013             |                      |         |  |  |  |
| 3  | 02256516                              | Gururaj Pandurang<br>Kundargi   | Non-Executive - Independent<br>Director     | Member                     | 11-08-2018             |                      |         |  |  |  |
| 4  | 03637265                              | Thoniparambil Raghavan<br>Raghunandan   | Non-Executive - Non<br>Independent Director | Member                     | 01-02-2020             |                      |         |  |  |  |
| 5  | 00996888                              | H.L.Shah  | Non-Executive - Non<br>Independent Director | Member                     | 01-02-2020             |                      |         |  |  |  |
| 6  | 00521065                              | Jagadish Rao Kote   | Non-Executive - Independent<br>Director     | Member                     | 01-02-2020             |                      |         |  |  |  |

| Sta | Stakeholders Relationship Committee |                               |   |                            |                        |                      |         |  |  |  |
|-----|-------------------------------------|-------------------------------|---|----------------------------|------------------------|----------------------|---------|--|--|--|
|     |                                     | Whether the Stakeholde        | egular Chairperson                          | Yes                        |                        |                      |         |  |  |  |
| Sr  | DIN<br>Number                       | Name of Committee<br>members  | Category 1 of directors                     | Category 2 of<br>directors | Date of<br>Appointment | Date of<br>Cessation | Remarks |  |  |  |
| 1   | 00521065                            | Jagadish Rao Kote             | Non-Executive - Independent<br>Director     | Chairperson                | 11-02-2021             |                      |         |  |  |  |
| 2   | 00996888                            | H.L.Shah                      | Non-Executive - Non<br>Independent Director | Member                     | 11-02-2021             |                      |         |  |  |  |
| 3   | 02256516                            | Gururaj Pandurang<br>Kundargi | Non-Executive - Independent<br>Director     | Member                     | 11-08-2018             |                      |         |  |  |  |
| 4   | 08378473                            | Latha Pillai                  | Non-Executive - Independent<br>Director     | Member                     | 01-04-2019             |                      |         |  |  |  |
| 5   | 08452844                            | Bahirji A Ghorpade            | Executive Director                          | Member                     | 01-04-2020             |                      |         |  |  |  |

| Ris | sk Manager    | nent Committee                        |   |                            |                        |                      |         |
|-----|---------------|---------------------------------------|---|----------------------------|------------------------|----------------------|---------|
|     |               | Whether the Risk                      | Management Committee has a Re               | gular Chairperson          | Yes                    |                      |         |
| Sr  | DIN<br>Number | Name of Committee<br>members          | Category 1 of directors                     | Category 2 of<br>directors | Date of<br>Appointment | Date of<br>Cessation | Remarks |
| 1   | 00150816      | Sattiraju Seshagiri Rao               | Non-Executive - Independent<br>Director     | Chairperson                | 11-08-2018             |                      |         |
| 2   | 03637265      | Thoniparambil Raghavan<br>Raghunandan | Non-Executive - Non<br>Independent Director | Member                     | 11-08-2018             |                      |         |
| 3   | 02256516      | Gururaj Pandurang<br>Kundargi         | Non-Executive - Independent<br>Director     | Member                     | 11-08-2018             |                      |         |
| 4   | 08452844      | Bahirji A Ghorpade                    | Executive Director                          | Member                     | 01-04-2020             |                      |         |
| 5   | 08378473      | Latha Pillai                          | Non-Executive - Independent<br>Director     | Member                     | 28-05-2019             |                      |         |
| 6   | 00996888      | H.L.Shah                              | Non-Executive - Non<br>Independent Director | Member                     | 28-05-2019             |                      |         |
| 7   | 00521065      | Jagadish Rao Kote                     | Non-Executive - Independent<br>Director     | Member                     | 28-05-2019             |                      |         |
| 8   | 00061497      | Md Abdul Saleem                       | Executive Director                          | Member                     | 01-04-2020             |                      |         |

| Co | Corporate Social Responsibility Committee |                                       |   |                        |                      |         |  |  |  |  |
|----|---|---------------------------------------|---|------------------------|----------------------|---------|--|--|--|--|
|    | W   | hether the Corporate Social Re        | gular Chairperson                           | Yes                    |                      |         |  |  |  |  |
| Sr | DIN<br>Number                             | Name of Committee<br>members          | Category 2 of<br>directors                  | Date of<br>Appointment | Date of<br>Cessation | Remarks |  |  |  |  |
| 1  | 00996888                                  | H.L.Shah                              | Non-Executive - Non<br>Independent Director | Chairperson            | 01-04-2020           |         |  |  |  |  |
| 2  | 00521065                                  | Jagadish Rao Kote                     | Non-Executive - Independent<br>Director     | Member                 | 28-05-2019           |         |  |  |  |  |
| 3  | 03637265                                  | Thoniparambil Raghavan<br>Raghunandan | Non-Executive - Non<br>Independent Director | Member                 | 28-05-2016           |         |  |  |  |  |
| 4  | 08452844                                  | Bahirji A Ghorpade                    | Executive Director                          | Member                 | 01-04-2020           |         |  |  |  |  |
| 5  | 00150816                                  | Sattiraju Seshagiri Rao               | Non-Executive - Independent<br>Director     | Member                 | 11-02-2021           |         |  |  |  |  |

| Ot | Other Committee |                                       |                                       |   |                            |         |  |  |  |
|----|-----------------|---------------------------------------|---------------------------------------|---|----------------------------|---------|--|--|--|
| Sr | DIN<br>Number   | Name of Committee<br>members          | Name of other committee               | Category 1 of directors                     | Category 2 of<br>directors | Remarks |  |  |  |
| 1  | 03637265        | Thoniparambil Raghavan<br>Raghunandan | Corporate Sustainability<br>Committee | Non-Executive - Non<br>Independent Director | Chairperson                |         |  |  |  |
| 2  | 00150816        | Sattiraju Seshagiri Rao               | Corporate Sustainability<br>Committee | Non-Executive - Independent<br>Director     | Member                     |         |  |  |  |
| 3  | 02256516        | Gururaj Pandurang Kundargi            | Corporate Sustainability<br>Committee | Non-Executive - Independent<br>Director     | Member                     |         |  |  |  |
| 4  | 08378473        | Latha Pillai                          | Corporate Sustainability<br>Committee | Non-Executive - Independent<br>Director     | Member                     |         |  |  |  |
| 5  | 00061497        | Md Abdul Saleem                       | Corporate Sustainability<br>Committee | Executive Director                          | Member                     |         |  |  |  |

| $\overline{}$ |  |   |  |                                       |   |  |   |  |  |  |
|---------------|--|---|--|---------------------------------------|---|--|---|--|--|--|
|               | Annexure 1   |   |  |                                       |   |  |   |  |  |  |
| An            | Annexure 1   |   |  |                                       |   |  |   |  |  |  |
| Ш             | III. Meeting of Board of Directors                               |   |  |                                       |   |  |   |  |  |  |
|               | Disclosure of notes on meeting of board of directors explanatory |   |  |                                       |   |  |   |  |  |  |
| Sr            | Date(s) of<br>meeting (if any)<br>in the previous<br>quarter     | Date(s) of<br>meeting (if any)<br>in the current<br>quarter | Maximum gap<br>between any two<br>consecutive (in<br>number of days) | Notes for<br>not<br>providing<br>Date | Whether<br>requirement of<br>Quorum met<br>(Yes/No) | Number of Directors<br>present* (All directors<br>including Independent<br>Director) | No. of<br>Independent<br>Directors<br>attending the<br>meeting* |  |  |  |
| 1             | 10-11-2021   |   |  |                                       | Yes   | 8  | 4   |  |  |  |
| 2             |  | 09-02-2022  | 90   |                                       | Yes   | 8  | 4   |  |  |  |

|     | Annexure 1                                |  |  |                               |                                       |  |  |  |  |
|-----|---|--|--|-------------------------------|---------------------------------------|--|--|--|--|
| IV. | V. Meeting of Committees                  |  |  |                               |                                       |  |  |  |  |
|     |   | I  | Disclosure of notes of   | on meeting of                 | f committee                           | s explanatory  |  |  |  |
| Sr  | Name of<br>Committee                      | Date(s) of meeting (Enter<br>dates of Previous quarter<br>and Current quarter in<br>chronological order) | Maximum gap<br>between any two<br>consecutive (in<br>number of days) | Name of<br>other<br>committee | Reson for<br>not<br>providing<br>date | Whether<br>requirement<br>of Quorum<br>met<br>(Yes/No) | Number of<br>Directors present*<br>(All directors<br>including<br>Independent<br>Director) | No. of<br>Independent<br>Directors<br>attending<br>the<br>meeting* |  |
| 1   | Audit<br>Committee                        | 10-11-2021   |  |                               |                                       | Yes  | 6  | 4  |  |
| 2   | Audit<br>Committee                        | 09-02-2022   | 90   |                               |                                       | Yes  | 6  | 4  |  |
| 3   | Stakeholders<br>Relationship<br>Committee | 09-11-2021   |  |                               |                                       | Yes  | 4  | 2  |  |
| 4   | Stakeholders<br>Relationship<br>Committee | 09-02-2022   | 91   |                               |                                       | Yes  | 5  | 3  |  |
| 5   | Risk<br>Management<br>Committee           | 09-02-2022   |  |                               |                                       | Yes  | 8  | 4  |  |

|    | Annexure 1  |     |  |  |  |  |  |  |  |
|----|---|-----|--|--|--|--|--|--|--|
| V. | V. Related Party Transactions   |     |  |  |  |  |  |  |  |
| Sr | 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  | NA  |  |  |  |  |  |  |  |
| 3  | Whether details of RPT entered into pursuant to omnibus approval have been reviewed by Audit Committee  | Yes |  |  |  |  |  |  |  |

|    | Annexure 1   |                               |  |  |  |
|----|--|-------------------------------|--|--|--|
| VI | Affirmations   |                               |  |  |  |
| Sr | Subject  | Compliance<br>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 a. Audit Committee  | Yes                           |  |  |  |
| 3  | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. b. Nomination & remuneration committee                                   | Yes                           |  |  |  |
| 4  | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. c. Stakeholders relationship committee                                   | Yes                           |  |  |  |
| 5  | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. d. Risk management committee (applicable to the top 500 listed entities) | Yes                           |  |  |  |
| 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                           |  |  |  |

|    | Annexure 1        |  |  |  |  |
|----|-------------------|--|--|--|--|
| Sr | Subject           | Compliance status                        |  |  |  |
| 1  | Name of signatory | BIJAN KUMAR DASH                         |  |  |  |
| 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. I | Disclosure on we  | bsite in terms                      | of Listing Ro   | egulations  |  |  |
| Sr   | Item  | Compliance<br>status<br>(Yes/No/NA) | If status is<br>"No"<br>details of<br>non-<br>compliance<br>may be<br>given here. | Web address   |  |  |
| 1    | Details of<br>business  | Yes                                 |   | https://www.sandurgroup.com/Business.html   |  |  |
| 2    | Terms and<br>conditions of<br>appointment<br>of<br>independent<br>directors                                     | Yes                                 |   | https://www.sandurgroup.com/doc/Policies/Terms%20 and %20 Conditions%20 for%20 Appointment%20 of%20 Independent%20 Director.pdf |  |  |
| 3    | Composition<br>of various<br>committees of<br>board of<br>directors   | Yes                                 |   | https://www.sandurgroup.com/Board-of-Directors-and-its-Committees.html  |  |  |
| 4    | Code of<br>conduct of<br>board of<br>directors and<br>senior<br>management<br>personnel                         | Yes                                 |   | https://www.sandurgroup.com/doc/Policies/Code-of-Conduct.pdf  |  |  |
| 5    | Details of<br>establishment<br>of vigil<br>mechanism/<br>Whistle<br>Blower policy                               | Yes                                 |   | https://www.sandurgroup.com/doc/Policies/Whistle%20Blower%20Policy.pdf  |  |  |
| 6    | Criteria of<br>making<br>payments to<br>non-executive<br>directors  | Yes                                 |   | https://www.sandurgroup.com/doc/Policies/Criteria-for-making-payments.pdf   |  |  |
| 7    | Policy on<br>dealing with<br>related party<br>transactions  | Yes                                 |   | https://www.sandurgroup.com/doc/Policies/Policy-On-Related-Party-Transactions.pdf   |  |  |
| 8    | Policy for<br>determining<br>'material'<br>subsidiaries   | Yes                                 |   | https://www.sandurgroup.com/doc/Policies/Policy%20for%20determining%20material%20subsidiary.pdf                                 |  |  |
| 9    | Details of<br>familiarization<br>programmes<br>imparted to<br>independent<br>directors                          | Yes                                 |   | https://www.sandurgroup.com/doc/Policies/Familiarisation%20programme%20for%20independent%20directors.pdf                        |  |  |

|      | Annexure II  |                                     |   |   |  |  |
|------|--|-------------------------------------|---|---|--|--|
|      | Annexure II to be submitted by listed entity at the end of the financial year (for the whole of financial year)  |                                     |   |   |  |  |
| I. I | Disclosure on wel  | osite in terms o                    | of Listing Reg  | gulations   |  |  |
| Sr   | Item   | Compliance<br>status<br>(Yes/No/NA) | If status is<br>"No"<br>details of<br>non-<br>compliance<br>may be<br>given here. | Web address   |  |  |
| 10   | Contact<br>information of<br>the designated<br>officials of the<br>listed entity<br>who are<br>responsible for<br>assisting and<br>handling<br>investor<br>grievances  | Yes                                 |   | http://sandurgroup.com/Investor-Grievance.html  |  |  |
| 11   | email address<br>for grievance<br>redressal and<br>other relevant<br>details   | Yes                                 |   | http://sandurgroup.com/Investor-Grievance.html  |  |  |
| 12   | Financial<br>results   | Yes                                 |   | https://www.sandurgroup.com/Quarterly-Results.html  |  |  |
| 13   | Shareholding<br>pattern  | Yes                                 |   | https://www.sandurgroup.com/ShareholdingPattern.html                                      |  |  |
| 14   | Details of<br>agreements<br>entered into<br>with the media<br>companies<br>and/or their<br>associates  | NA                                  |   |   |  |  |
| 15   | Schedule of<br>analyst or<br>institutional<br>investor meet<br>and<br>presentations<br>made by the<br>listed entity to<br>analysts or<br>institutional<br>investors<br>simultaneously<br>with<br>submission to<br>stock exchange | Yes                                 |   | https://www.sandurgroup.com/News-and-Events.html  |  |  |
| 16   | New name and<br>the old name of<br>the listed entity   | NA                                  |   |   |  |  |
| 17   | Advertisements<br>as per<br>regulation 47<br>(1)   | Yes                                 |   | https://www.sandurgroup.com/News-and-Events.html  |  |  |
| 18   | Credit rating or<br>revision in<br>credit rating<br>obtained   | Yes                                 |   | https://www.sandurgroup.com/Credit-Rating.html  |  |  |
| 19   | Separate<br>audited<br>financial<br>statements of<br>each subsidiary<br>of the listed<br>entity in<br>respect of a<br>relevant<br>financial year   | NA                                  |   |   |  |  |
| 20   | Whether<br>company has<br>provided<br>information<br>under separate<br>section on its<br>website as per<br>Regulation<br>46(2)   | Yes                                 |   | https://www.sandurgroup.com/Investors-Desk.html   |  |  |
| 21   | Materiality<br>Policy as per<br>Regulation 30  | Yes                                 |   | https://www.sandurgroup.com/doc/Policies/Policy%20on%20determination%20of%20materiality.p |  |  |
| 22   | Dividend<br>Distribution<br>policy as per<br>Regulation<br>43A (as<br>applicable)  | Yes                                 |   | https://www.sandurgroup.com/doc/Policies/Final-Dividend-Distribution-Policy.pdf           |  |  |
| 23   | It is certified<br>that these<br>contents on the<br>website of the<br>listed entity are  | Yes                                 |   | https://www.sandurgroup.com/Investors-Desk.html   |  |  |

|     | Annexure II   |                              |                                     |  |  |
|-----|---|------------------------------|-------------------------------------|--|--|
| II. | Annual Affirmations   |                              |                                     |  |  |
| Sr  | Particulars   | Regulation<br>Number         | Compliance<br>status<br>(Yes/No/NA) | If status is "No" details of non-<br>compliance may be given here. |  |
| 1   | Independent director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility' | 16(1)(b) &<br>25(6)          | Yes                                 |  |  |
| 2   | Board composition   | 17(1),<br>17(1A) &<br>17(1B) | 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                                 |  |  |

|     |  | Ann                      | exure II                         |   |
|-----|--|--------------------------|----------------------------------|---|
| II. | Annual Affirmations  |                          |                                  |   |
| Sr  | Particulars  | Regulation<br>Number     | Compliance status<br>(Yes/No/NA) | If status is "No" details of non-compliance<br>may be given here. |
| 11  | Risk Assessment & Management                               | 17(9)                    | Yes                              |   |
| 12  | Performance Evaluation of Independent<br>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  | Composition of nomination & remuneration committee         | 19(1) & (2)              | Yes                              |   |
| 18  | Quorum of Nomination and Remuneration<br>Committee meeting | 19(2A)                   | Yes                              |   |
| 19  | Meeting of Nomination and Remuneration<br>Committee        | 19(3A)                   | Yes                              |   |
| 20  | Composition of Stakeholder Relationship<br>Committee       | 20(1), 20(2) &<br>20(2A) | Yes                              |   |

|     | Annexure II   |                                  |                                  |  |  |
|-----|---|----------------------------------|----------------------------------|--|--|
| II. | Annual Affirmations   |                                  |                                  |  |  |
| Sr  | Particulars   | Regulation<br>Number             | Compliance status<br>(Yes/No/NA) | If status is "No" details of non-<br>compliance may be given here. |  |
| 21  | Meeting of Stakeholders Relationship Committee                                      | 20(3A)                           | Yes                              |  |  |
| 22  | Composition and role of risk management committee                                   | 21(1),(2),(3),(4)                | Yes                              |  |  |
| 23  | Meeting of Risk Management Committee  | 21(3A)                           | Yes                              |  |  |
| 24  | Vigil Mechanism   | 22                               | Yes                              |  |  |
| 25  | Policy for related party Transaction  | 23(1),(1A),(5),<br>(6),(7) & (8) | Yes                              |  |  |
| 26  | Prior or Omnibus approval of Audit Committee for all related party transactions     | 23(2), (3)                       | Yes                              |  |  |
| 27  | Approval for material related party transactions                                    | 23(4)                            | NA                               |  |  |
| 28  | Disclosure of related party transactions on consolidated basis                      | 23(9)                            | Yes                              |  |  |
| 29  | Composition of Board of Directors of unlisted<br>material Subsidiary                | 24(1)                            | NA                               |  |  |
| 30  | Other Corporate Governance requirements with respect to subsidiary of listed entity | 24(2),(3),(4),(5)<br>& (6)       | NA                               |  |  |

|     | Annexure II   |                      |                                     |  |  |
|-----|---|----------------------|-------------------------------------|--|--|
| II. | Annual Affirmations   |                      |                                     |  |  |
| Sr  | Particulars   | Regulation<br>Number | Compliance<br>status<br>(Yes/No/NA) | If status is "No" details of non-<br>compliance may be given here. |  |
| 31  | Annual Secretarial Compliance Report  | 24(A)                | Yes                                 |  |  |
| 32  | Alternate Director to Independent Director  | 25(1)                | NA                                  |  |  |
| 33  | Maximum Tenure  | 25(2)                | Yes                                 |  |  |
| 34  | Meeting of independent directors  | 25(3) &<br>(4)       | Yes                                 |  |  |
| 35  | Familiarization of independent directors  | 25(7)                | Yes                                 |  |  |
| 36  | Declaration from Independent Director   | 25(8) &<br>(9)       | Yes                                 |  |  |
| 37  | D & O Insurance for Independent Directors   | 25(10)               | Yes                                 |  |  |
| 38  | Memberships in Committees   | 26(1)                | Yes                                 |  |  |
| 39  | Affirmation with compliance to code of conduct from members of Board of Directors and Senior management personnel | 26(3)                | Yes                                 |  |  |
| 40  | Disclosure of Shareholding by Non-Executive Directors   | 26(4)                | Yes                                 |  |  |
| 41  | Policy with respect to Obligations of directors and senior management   | 26(2) &<br>26(5)     | Yes                                 |  |  |
|     | Any other information to be provided - Add Notes  |                      |                                     |  |  |

|   | Annexure II       |  |  |
|---|-------------------|--|--|
| 1 | Name of signatory | Bijan Kumar Dash                         |  |
| 2 | Designation       | Company Secretary and Compliance Officer |  |

|    | Annexure II  |                           |  |  |  |
|----|--|---------------------------|--|--|--|
| Ш  | III. Affirmations  |                           |  |  |  |
| Sr | Sr Particulars Compliance s (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   | Textual<br>Information(1) |  |  |  |

| Text Block             |   |  |
|------------------------|---|--|
| Textual Information(1) | The Corporate Governance requirements with respect to material subsidiary is not applicable as the Company does not have any material subsidiaries during the year. |  |

|   | Annexure II       |  |  |
|---|-------------------|--|--|
| 1 | Name of signatory | Bijan Kumar Dash                         |  |
| 2 | Designation       | Company Secretary and Compliance Officer |  |

| Additional Half yearly Disclosure   |   |   |  |  |
|---|---|---|--|--|
| Applicability of disclosure   | Applicable                                  |   |  |  |
| Reason for Non Applicability  | Textual Information(1)                      |   |  |  |
| I. Disclosure of Loans/ guarantees/comfort letters /securi  | ties etc.refer note below                   |   |  |  |
| (A)Any loan or any other form of debt advanced by the liste   | d entity directly or indirectly to          |   |  |  |
| Entity  | Aggregate amount advanced during six months | Balance<br>outstanding<br>at the end of<br>six months                 |  |  |
| Promoter or any other entity controlled by them   | 0   | 0   |  |  |
| Promoter Group or any other entity controlled by them   | 0   | 0   |  |  |
| Directors (including relatives) or any other entity controlled<br>by them   | 0   | 0   |  |  |
| KMPs or any other entity controlled by them   | 0   | 0   |  |  |
| (B) Any guarantee / comfort letter (by whateve-<br>indirectly, in connection with any loan(s) or an   | Aggregate<br>amount of                      | Balance<br>outstanding at the<br>end of six                           |  |  |
| Entity  | Type (guarantee, comfort letter etc.)       | issuance<br>during six<br>months                                      | months(taking into<br>account any<br>invocation)   |  |
| Promoter or any other entity controlled by them   | 0   | 0   | 0  |  |
| Promoter Group or any other entity controlled by them   | 0   | 0   | 0  |  |
| Directors (including relatives) or any other entity controlled<br>by them   | 0   | 0   | 0  |  |
| KMPs or any other entity controlled by them   | 0   | 0   | 0  |  |
| (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  |   |   |  |  |
| Entity  | Type of security (cash, shares etc.)        | Aggregate<br>value of<br>security<br>provided<br>during six<br>months | Balance<br>outstanding at the<br>end of six months |  |
| Promoter or any other entity controlled by them   | 0   | 0   | 0  |  |
| Promoter Group or any other entity controlled by them   | 0   | 0   | 0  |  |
| Directors (including relatives) or any other entity controlled<br>by them   | 0   | 0   | 0  |  |
| KMPs or any other entity controlled by them   | 0   | 0   | 0  |  |
| (D) Additional Information  |   |   | Textual<br>Information(2)                          |  |
| II. Affirmations  |   |   |  |  |
| Affirmations  |   | Compliance<br>Status  | Company Remarks                                    |  |
| 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 to promoter(s), promoter group, director(s) (including their relatives), key managerial personnel (including their relatives) or any entity controlled by them are in the economic interest of the company. |   | Yes   | Textual<br>Information(3)                          |  |
| Name  | Bahirji A Ghorpade                          |   |  |  |
| Designation   | CEO   |   |  |  |
| Place   | Bengaluru                                   |   |  |  |
| Date  | 12-04-2022                                  |   |  |  |

| Signatory Details     |  |  |
|-----------------------|--|--|
| Name of signatory     | Bijan Kumar Dash                         |  |
| Designation of person | Company Secretary and Compliance Officer |  |
| Place                 | Bengaluru                                |  |
| Date                  | 12-04-2022                               |  |