

Sun Pharmaceutical Industries Limited

Sun House, Plot No. 201 B/1
Western Express Highway, Goregaon (E),
Mumbai – 400 063, Maharashtra, INDIA.
Tel : (91-22) 4324 4324
Fax : (91-22) 4324 4343
Website: www.sunpharma.com
CIN : L24230GJ1993PLC019050



May 27, 2022

National Stock Exchange of India Ltd,
Exchange Plaza, 5th Floor,
Plot No. C/1, G Block,
Bandra Kurla Complex,
Bandra (East),
Mumbai – 400 051.
NSE Code: SUNPHARMA

BSE Limited.,
Market Operations Dept.
P. J. Towers,
Dalal Street,
Mumbai - 400 001.
Security Code : 524715

Dear Sirs,


Subject: Submission of Annual Secretarial Compliance Report for the financial year 2021-22

Pursuant to requirement of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company for the financial year 2021-22 issued by KJB & Co. LLP, Practicing Company Secretaries.

This is for your information and records.

Yours faithfully,

For Sun Pharmaceutical Industries Limited


Anoop Deshpande
Company Secretary & Compliance Officer
Encl: as above

**Secretarial compliance report of
Sun Pharmaceutical Industries Limited
for the year ended 31st March 2022**

We, KJB & CO LLP, Practising Company Secretaries, have examined:

- a) all the documents and records made available to us and explanation provided by Sun Pharmaceutical Industries Limited (“**the 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 2022 (“**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;
- b) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- 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 - **Not applicable to the Company for the period under review;**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **Not applicable to the Company for the period under review;**
- f) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - **Not applicable to the Company for the period under review;**
- g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not applicable to the Company for the period under review;**
- h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 - **Not applicable to the Company for the period under review;**

and circulars/ guidelines issued thereunder; and based on the above examination, we hereby report that, during the Review Period:

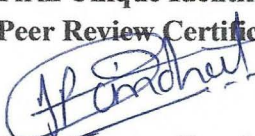
- a) The listed entity has complied with the provisions of the above regulations and circulars/ guidelines issued thereunder.



- 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 our examination of those records.
- c) There was no action taken against the Company/ 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 issued thereunder.
- d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the Company, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	While the Company has fulfilled the payment obligations as per the redemption schedule, there are instances of delay in filing of certificates as required under para 2.4 of Annexure II of SEBI CP Circulars which was inadvertent delay as informed to us.	31st March 2021	During the year, the required certificates were filed within the prescribed time-limit as required under para 2.4 of Annexure II of SEBI CP Circulars.	No further comments.
2	The Company has annually submitted the quarterly certificates required under para 4 Annexure II of SEBI CP Circulars presuming that these compliances can be done annually.	31st March 2021	During the year under review, the Company has submitted the quarterly certificates on quarterly basis.	No further comments.

For, KJB & CO LLP,
Practicing Company Secretary
Firm Unique Identification No. – L2020MH006600
Peer Review Certificate No. – 934/2020


Alpeshkumar Panchal
Partner

ACS No.: 49008
C P No.: 20120

UDIN: A049008D000407476

Date: May 27, 2022 / Jyeshtha 6, 1944

Place: Vadodara

