



May 13, 2021

✓ **BSE Limited,**
Department of Corporate Services,
P. J. Towers, Dalal Street,
Mumbai Samachar Marg,
MUMBAI - 400 001.

National Stock Exchange of India Ltd.,
Exchange Plaza,
Bandra Kurla Complex,
Bandra (East),
MUMBAI - 400 051.

Dear Sir/Madam,

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

In compliance with Clause 3(b)(iii) of SEBI Circular No. CIR/CFD/CMD 1/27/2019 dated February 8, 2019, and Regulation 24A(2) of the SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2021, enclosed is the Annual Secretarial Compliance Report for the year ended March 31, 2021, issued by Ms. Neena Bhatia, Practising Company Secretary (FCS - 9492 CP. NO. 2661).

Kindly note the above and take on record.

For LUPIN LIMITED

R. V. SATAM
COMPANY SECRETARY
(ACS - 11973)

Encl- : a/a.



N. J. BHATIA
COMPANY SECRETARY

C-93, Snehadhara, Dadabhai Cross Road No. 3, Vile Parle (W), Mumbai - 400 056.
Cell : 9870002130 E-mail : njbhatia@rediffmail.com / njbhatia21@gmail.com

SECRETARIAL COMPLIANCE REPORT

OF LUPIN LIMITED FOR THE FINANCIAL YEAR ENDED MARCH 31, 2021

I, Ms. Neena J. Bhatia, Company Secretary in practice have examined: -

- a. all documents and records made available to me and explanations provided by Lupin Limited;
- b. filings/submissions made by Lupin Limited to the Stock Exchanges;
- c. website of Lupin Limited; and
- d. such other document/filing, as may be relevant, which has been relied upon to make this certification.

for the year ended March 31, 2021 ('Review Period') in respect of compliance with the provisions of:-

- a. the Securities and Exchange Board of India Act, 1992 ('SEBI Act') and Regulations, circulars, guidelines issued thereunder; and
- b. the Securities Contracts (Regulation) Act, 1956 ('SCRA'), Rules made thereunder and Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ('SEBI').

Specific Regulations, whose provisions and circulars/guidelines issued thereunder, have been examined, include: -

- a. SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b. SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c. SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d. SEBI (Prohibition of Insider Trading) Regulations, 2015;
- e. SEBI (Share Based Employee Benefits) Regulations, 2014;
- f. SEBI (Depositories and Participants) Regulations, 2018;
- g. SEBI (Investor Protection and Education Fund) Regulations, 2009;
- h. SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 and SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) (Amendment) Regulations, 2018; and
- i. SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993
and circulars/ guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period: -

- a. Lupin Limited has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of matters specified below: -

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
Not Applicable			

- b. Lupin Limited has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from my examination of those records.

- c. The following are the details of actions taken against Lupin Limited/ 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:

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

- d. Lupin Limited 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 March 31, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				
I have conducted online verification and examination of records, as facilitated by the Company due to COVID 19 and subsequent lockdown for the purpose of issuing this Report. I have taken declaration from the management regarding the said compliances.				

Place: Mumbai,
Date: May 12, 2021
UDIN: F009492C000280279

NEENA
BHATIA

Digitally signed by NEENA BHATIA
DN: cn=NEENA BHATIA, o=Practicing Company Secretary, email=neena@lupin.com, postalCode=400004, c=IN

Ms. Neena J Bhatia
(Company Secretary)
(FCS No: 9492 CP. No.: 2661)