

30th June, 2021

BSE Limited

Department of Corporate Relationship
1st Floor, New Trade Ring, Rotunda Building
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai- 400001
Scrip Code: 524742

National Stock Exchange of India Ltd.,

Department of Corporate Services
Exchange Plaza, 5th Floor,
C-1, Block G, Bandra Kurla Complex,
Bandra (E), Mumbai – 400 051
Scrip Code: CAPLIPOINT.

Dear Sirs,

Sub: Annual Secretarial Compliance Report


Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, please find attached the Annual Secretarial Compliance report for the year ended 31st March, 2021.

This is for your kind information and records.

Thanking You,

Sincerely yours,

For Caplin Point Laboratories Limited



Dinesh R G

Company Secretary



G RAMACHANDRAN & ASSOCIATES
COMPANY SECRETARIES

**SECRETARIAL COMPLIANCE REPORT OF
M/S. CAPLIN POINT LABORATORIES LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2021**

1. We have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. CAPLIN POINT LABORATORIES 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, 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");

2. 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



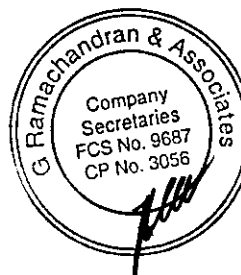
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; Not applicable during the period under review.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not applicable during the period under review.
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not applicable during the period under review.
- (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:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -

S. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
1	Regulation 34 - Uploading of Annual report for the FYE 31 st March, 2020	Due date - 1 st September, 2020 Actual date of uploading on National Stock Exchange Ltd (NSE) website - 31 st December, 2020.	Please refer to the note given in Point (c) below. The Practising Company Secretary advised the company to ensure timely compliance in future.



- (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) The National Stock Exchange has issued a notice under Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the details of which is given under:

The company has received a notice from NSE vide No. NSE/LIST-SOP/REG-34/FINES/0814 dated 8th January, 2021 regarding non -compliance of Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for Non-uploading of Annual Report for the financial year ended 31st March, 2020 on the NSE Website and imposing a fine.

The company sent its replies dated 18th January, 2021 and 28th January, 2021 stating that the delay in uploading of its annual report for the financial year 31st March, 2020 was inadvertence and mainly duly to technical problems, outbreak of Covid-19 pandemic and consequent lockdown. We were informed that in terms of Exchange's policy for exemption of fine, the Company has requested for waiver with NSE, inter-alia, citing aforementioned reasons. We also observed that the Company dispatched the Notice and Annual Report to the Shareholders and uploaded the same in the website of BSE within the prescribed time.

The Board of directors at their meeting held on 4th February, 2021 took a note of the notice and replies filed by the company seeking waiver of the fine.

Apart from the above, no action was taken against the listed entity/ 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) There were no observations made in the previous report, hence reporting on actions to comply with the observations made in previous reports does not arise.



- (e) The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from the listed entities and their material subsidiaries" is not applicable during the review period.

For M/s. ~~G Ramachandran & Associates~~
Company Secretaries



G. Ramachandran
G RAMACHANDRAN
Proprietor
M.No.: F9687, COP: 3056

Place: Chennai
Date: 29th June, 2021
UDIN: F009687C000536840