



May 30, 2023

**BSE Limited**

Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai – 400 001

Scrip code: 532531

**The National Stock Exchange of India Limited**

Exchange Plaza, Bandra-Kurla Complex  
Bandra (E) Mumbai - 400 051

Scrip code: STAR

Dear Madam/ Sir,

**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2023**

Pursuant to Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015, please find enclosed copy of Annual Secretarial Compliance Report dated May 24, 2023, for the year ended March 31, 2023, issued by M/s. Gopalakrishnaraj H H & Associates, Practicing Company Secretaries.

We request you to kindly take the same on record.

Thanks & Regards,  
For **Strides Pharma Science Limited**,

**Manjula Ramamurthy**  
Company Secretary  
ICSI Membership No.: A30515



*Encl. As above*

**Strides Pharma Science Limited**

CIN: L24230MH1990PLC057062

Corp Off: Strides House, Bilekahalli, Bannerghatta Road, Bengaluru - 560 076, India | Tel: +91 80 6784 0000 Fax: +91 80 6784 0700

Regd Off: 201, Devavrata, Sector 17, Vashi, Navi Mumbai – 400 703, India | Tel: +91 22 2789 2924 / 3199 Fax: +91 22 2789 2942

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**SECRETARIAL COMPLIANCE REPORT OF  
STRIDES PHARMA SCIENCE LIMITED  
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2023**

We have conducted the review of compliance of applicable statutory provisions and adherence to good corporate practices by **Strides Pharma Science Limited** (hereinafter referred as ‘the listed entity’), having its Registered Office at 201, Devavrata, Sector 17, Vashi, Navi Mumbai – 400 703, Maharashtra, India. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating corporate conducts/ statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity’s books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on March 31, 2023, complied with statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

We, M/s. Gopalakrishnaraj H H & Associates, Practicing Company Secretaries, have examined:

1. all documents and records made available to us, and explanation provided by Strides Pharma Science Limited (CIN: L24230MH1990PLC057062) (‘the listed entity’),
2. the filings/ submissions made by the listed entity to the stock exchanges,
3. website of the listed entity,
4. any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **March 31, 2023** (‘Review Period’) in respect of compliance with the provisions of:

1. the Securities and Exchange Board of India Act, 1992 (‘SEBI Act’) and the regulations, circulars, guidelines issued thereunder; and
2. 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 circulars/ guidelines issued thereunder, have been examined, include:

1. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
2. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

3. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
4. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; *Company was not required to comply with this regulation considering there were no instances during the review period.*
5. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
6. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; *Company was not required to comply with this regulation considering there were no instances during the review period.*
7. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
8. and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the review period:

- I) 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:

#	Compliance Requirement (Regulations/ circulars/ guidelines including specific clauses)	Regulation/ Circular No.	Deviations	Action taken by	Type of action (Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning etc.)	Details of violations	Fine Amount	Observations/ Remarks of PCS	Management Response	Remarks
NONE										

- b) The listed entity has taken the following actions to comply with the observations made in previous reports:

#	Compliance Requirement (Regulations/ circulars/ guidelines including specific clauses)	Regulation/ Circular No.	Deviations	Action taken by	Type of action (Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning etc.)	Details of violations	Fine Amount	Observations/ Remarks of PCS	Management Response	Remarks
NONE										



II) Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019:

#	Particulars	Compliance Status (Yes/ No/ NA)	Observations/ Remarks by PCS*
1.	<b>Compliances with the following conditions while appointing/ re-appointing an auditor:</b>		
i)	If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	Statutory Auditor of the Company have not resigned during the year under review.
ii)	If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	NA	
iii)	If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	
2.	<b>Other conditions relating to resignation of Statutory Auditor</b>		
i)	Reporting of concerns by Auditor with respect to the listed entity/ its material subsidiary to the Audit Committee:		
a)	In case of any concern with the management of the listed entity/ material subsidiary such as non-availability of information/ non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.	NA	Statutory Auditor of the Company & its Material Subsidiary have not resigned during the year under review.
b)	In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information/ explanation from the company, the auditor has informed the Audit Committee	NA	

	the details of information/ explanation sought and not provided by the management, as applicable.		
	c) The Audit Committee/ Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.	NA	
ii)	<b>Disclaimer in case of non-receipt of information:</b>  The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI/ NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	NA	
3.	The listed entity/ its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure-A in SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019.	NA	

III) We hereby report that, during the review period the compliance status of the listed entity is appended as below:

#	Particulars	Compliance Status (Yes/ No/ NA)	Observations/ Remarks by PCS
1	<b>Secretarial Standards:</b>  The compliances of listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	-
2	<b>Adoption and timely updation of Policies:</b>  <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entity</li> <li>• All policies are in conformity with SEBI Regulations and have been reviewed &amp; timely updated as per regulations/ circulars/ guidelines issued by SEBI</li> </ul>	Yes	-

3	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"> <li>• Listed entity is maintaining a functional website.</li> <li>• Timely dissemination of documents/ information under a separate section on the website.</li> <li>• Web-links provided in Annual Corporate Governance Reports under Regulation 27 (2) are accurate and specific which re-directs to the relevant document(s)/ section of the website.</li> </ul>	Yes	-
4	<b>Disqualification of Director:</b>  None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	-
5	<b>To examine details related to Subsidiaries of listed entity:</b> <ol style="list-style-type: none"> <li>a) Identification of material subsidiary companies</li> <li>b) Requirement with respect to Disclosure requirement of material as well as other subsidiaries</li> </ol>	Yes	-
6	<b>Preservation of Documents:</b>  The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	-
7	<b>Performance Evaluation:</b>  Listed entity has conducted performance evaluation of the Board, Independent Directors, and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	-
8	<b>Related Party Transactions:</b> <ol style="list-style-type: none"> <li>a) Listed entity has obtained prior approval of Audit Committee for all Related Party Transactions</li> </ol>	Yes	-



	b) In case no prior approval is obtained, Listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee		
9	<b>Disclosure of events or information:</b>  Listed entity has provided all required disclosures under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015, within time limits prescribed thereunder.	Yes	-
10	<b>Prohibition of Insider Trading:</b>  Listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	Yes	-
12	<b>Additional Non-compliances, if any:</b>  No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc.	Yes	-

**Assumptions & Limitation of scope and Review:**

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.



## Gopalakrishnaraj H H & Associates

### Company Secretaries

No. 369, 1<sup>st</sup> Floor, 16<sup>th</sup> Main, Near 36<sup>th</sup> Cross  
4<sup>th</sup> T Block, Jayanagar, Bengaluru – 560 041  
Tel: +91(080) 4971 2653; Cell: +91 98452 97653  
Email: gopal@gkracs.in

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4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**UDIN: F005654E000366731**

For Gopalakrishnaraj H H & Associates  
Company Secretaries

GOPALAKRISHNARAJ  
HARIAPPANA  
HARIAPPABHAT

Digitally signed by  
GOPALAKRISHNARAJ HARIAPPANA  
HARIAPPABHAT  
Date: 2023.05.24 14:54:37 +05'30'

Gopalakrishnaraj H H  
Proprietor  
FCS: 5654; CP: 4152  
PR: 945/2020

Place: Bengaluru  
Date: 24<sup>th</sup> May 2023