



May 19, 2020

**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 Sirs,

**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2020**

In compliance with SEBI Circular No. CIR/ CFD/ CMD1/ 27/ 2019 dated February 8, 2019, please find enclosed copy of Annual Secretarial Compliance Report dated May 14, 2020 for the year ended March 31, 2020 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**

A handwritten signature in blue ink that reads 'Manjula R.'.

**Manjula Ramamurthy**  
Company Secretary



**Strides Pharma Science Limited**

(Formerly Strides Shasun Limited)

CIN: L24230MH1990PLC057062

**Corp Off:** Strides House, Bilekahalli, Bannerghatta Road, Bangalore - 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

info@strides.com; www.strides.com

**Secretarial Compliance Report of Strides Pharma Science Limited for the year ended  
31/03/2020**

(As per SEBI Circular CIR/CFD/CMD1/27/2019 dated 08/02/2019)

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

- (a) all the documents and records made available to us and explanation provided by Strides Pharma Science Limited (formerly Strides Shasun Limited) (“the listed entity”)
- (b) the filings/ submissions made by the listed entity to the stock exchanges website of the listed entity
- (c) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

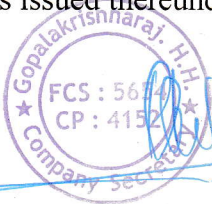
for the year ended 31/03/2020 (“Review Period”) in respect of compliance with the provisions of:

- (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 (Issue of Capital and Disclosure Requirements) Regulations, 2018: Not Applicable as there was no reportable event during the Review Period
- (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 as there was no reportable event during the Review Period
- (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 as there was no reportable event during the Review Period
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013: Not Applicable as there was no reportable event during the Review Period
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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, 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
1.	Regulation 25(6) of Securities And Exchange Board Of India (Listing Obligations And Disclosure Requirements) Regulations, 2015  <i>An independent director who resigns or is removed from the board of directors of the listed entity shall be replaced by a new independent director by listed entity at the earliest but not later than the immediate next meeting of the board of directors or three months from the date of such vacancy, whichever is later</i>	Delay in appointment of woman independent Director	As on 30 <sup>th</sup> July, 2019, the then extant Independent Woman Director was not reappointed by the members in the Annual General Meeting held on 30 <sup>th</sup> July 2019. This vacancy was due for appointment within October 31, 2019. This vacancy was filled in through a circular resolution of the Board of Directors dated 11 <sup>th</sup> December 2019. Effective 11 <sup>th</sup> December 2019 Company's Board composition is in compliance with the requirements under Companies Act, 2013 and the SEBI Listing Regulations.

- (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 were no actions 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 items for which the listed entity was ought to have taken the actions to comply with the observations made in previous reports.
- (e) As per SEBI Circular CIR/CFD/CMD1/114/2019, dated 18/10/2019, the company has suitably modified the terms of appointment of the Auditors to give effect to clauses 6(A) and 6(B) of the said SEBI circular, through a letter dated 23/10/2019.

Further, we state that due to restrictions imposed by the Government on account of COVID-19, we were not able to verify certain records physically and relied on the soft copies provided electronically by the company.

Place: Bengaluru

Date: 14/05/2020



For Gopalakrishnaraj H H & Associates  
Company Secretaries

Gopalakrishnaraj H H  
Proprietor

FCS: 5654; CP: 4152

UDIN: F005654B000239261