

27<sup>th</sup> May, 2021

The Dy. General Manager (Listing Dept.)  
BSE Limited,  
Corporate Relationship Dept.,  
1<sup>st</sup> Floor, New Trading Ring,  
P. J. Towers, Dalal Street, Fort,  
Mumbai - 400 001  
**(BSE Scrip Code: 500420)**

The Manager – Listing Dept.,  
National Stock Exchange of India Ltd.,  
Exchange Plaza, 5<sup>th</sup> Floor,  
Plot No. C/1, G. Block,  
Bandra - Kurla Complex, Bandra (E),  
Mumbai – 400 051  
**(NSE Scrip Code: TORNTPHARM)**

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the year ended 31-Mar-21**

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08-Feb-19, kindly find enclosed Annual Secretarial Compliance Report for the year ended on 31-Mar-21 issued by M/s. M. C. Gupta & Co., Practicing Company Secretaries, Ahmedabad.

Kindly take note of the above.

Thanking you,

Yours sincerely,

For TORRENT PHARMACEUTICALS LIMITED

MAHESH AGRAWAL  
VP (LEGAL) & COMPANY SECRETARY

Encl : A/a

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**TORRENT PHARMACEUTICALS LIMITED**

CIN: L24230GJ1972PLC002126

Reg. Office : Torrent House, Off Ashram Road, Ahmedabad- 380 009, India. Phone: +91 79 26599000, Fax: +91 79 26582100,  
[www.torrentpharma.com](http://www.torrentpharma.com)

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*M. C. Gupta & Co.*  
*Company Secretaries*

CS Mahesh C. Gupta  
B.Com (Hons.), LL.M., MBA, ACMA, FCS

**Secretarial Compliance Report of Torrent Pharmaceuticals Limited for the  
year ended 31<sup>st</sup> March, 2021**

To,  
Torrent Pharmaceuticals Limited,  
Torrent House,  
Off Ashram Road,  
Ahmedabad – 380 009.

In terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 Dated February 8, 2019, we have examined:

- (a) all the online documents and records made available to us and explanation provided by Torrent Pharmaceuticals Limited (“the listed entity”) CIN: (L24230GJ1972PLC002126) and having its Registered office at Torrent House, Off Ashram Road, Ahmedabad – 380 009,
- (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 31<sup>st</sup> 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”);

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 during the reporting 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 during the reporting period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not Applicable during the reporting period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;



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*M. C. Gupta & Co.*  
*Company Secretaries*

**CS Mahesh C. Gupta**  
B.Com (Hons.), LL.M., MBA, ACMA, FCS

- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 (Not Applicable during the reporting period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and the 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 applicable 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) The following are the details of 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:

| Sr. No. | Action taken by | Details of violation | Details of action taken e.g. fines, warning letter, department, etc. | Observations/Remarks of the Practicing Company Secretary, if any |
|---------|-----------------|----------------------|--|--|
| NIL     |                 |                      |  |  |

- (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 (years to be mentioned) | Action taken by the listed entity, if any | Comments of the Practicing Company Secretary on the Action taken by the listed entity |
|----------------|--|---|---|---|
| NOT APPLICABLE |  |   |   |   |

Place: Ahmedabad  
Date: 18<sup>th</sup> May, 2021



For M. C. Gupta & Co.  
Company Secretaries  
UCN: S1986GJ003400

*Mahesh Gupta*

Mahesh C Gupta  
Proprietor  
FCS: 2047 (CP: 1028)  
UDIN: F002047C000338460