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| <b>BSE Limited</b><br>Listing & Compliance Department<br>Phiroze Jeejeebhoy Towers,<br>Dalal Street,<br>Mumbai - 400001 | <b>The National Stock Exchange of India Limited</b><br>Listing & Compliance Department<br>Exchange Plaza, C-1 Block G,<br>Bandra Kurla Complex,<br>Bandra (E), Mumbai-400051 |
| <b>Security Code: 517206</b>  | <b>Symbol: LUMAXIND</b>  |

**Sub.: Annual Secretarial Compliance Report pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Dear Sir/Ma'am,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, kindly find appended hereto, the Annual Secretarial Compliance Report of the Company for the Financial Year ended 31st March, 2021 duly issued by Mr. Maneesh Gupta, Practicing Company Secretary (FCS 4982).

You are requested to kindly take the same in your records.

Thanking You,

Yours faithfully,

For **LUMAX INDUSTRIES LIMITED**



**PANKAJ MAHENDRU**  
**COMPANY SECRETARY**  
**M.NO. A-28161**



Encl: as above

**MANEESH GUPTA**

18/15, 2<sup>nd</sup> Floor,  
Shakti Nagar, Delhi-110 007  
Ph: 9871208877

ANNUAL SECRETARIAL COMPLIANCE REPORT OF LUMAX INDUSTRIES  
LIMITED FOR THE YEAR ENDED MARCH 31, 2021

Lumax Industries Limited,  
2<sup>nd</sup> Floor, Harbans Bhawan-II  
Commercial Complex,  
Nangal Raya,  
New Delhi-110 046

**Sub: Secretarial Compliance Report**

Sir/ Madam,

I, Maneesh Gupta, Practicing Company Secretary have examined

- a) all the documents and records made available to us and explanation provided by the Lumax Industries Limited (“the listed entity”),
- b) the filings/submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity, and
- d) any other document/ filing, as may be relevant, which has been relied upon to make the 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 the regulations, circulars, guidelines issued thereunder; and
- b) the Securities and 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 to the Company 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 to the Company during the review period.**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - **Not Applicable to the Company during the review period.**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not Applicable to the Company 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 to the Company during the review period.**
- h) Securities and Exchange Board of India (Prohibition of Insider trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

and circulars /guidelines issued thereunder;

and based on the above examination, I 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.
- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued together insofar as it appears from my examination of those records.
- c) There was no action 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) The listed entity has taken the following actions to comply with the observations made in previous reports: - **Not Applicable as there were no observations which require action.**

**Place: New Delhi**  
**Date: May 18, 2021**  
**UDIN: F004982C000335037**

MANEES H GUPTA Digitally signed by  
MANEESH GUPTA  
Date: 2021.05.18  
14:40:25 +05'30'

**Maneesh Gupta**  
**FCS No.: 4982**  
**CP No.: 2945**