



PUMPING LIFE

Date:-29.06.2021

To,
The Manager,
Listing Department
The National Stock Exchange of India Ltd.
Exchange plaza, BKC, Bandra (E)
Mumbai-MH 400051.

To,
The Manager,
Listing Department
The BSE Ltd.
P.J. Towers, Dalal Street
Mumbai- MH 400001.

REF: - (ISIN- INE908D01010) SCRIP CODE BSE-531431, NSE*Symbol -SHAKTIPUMP

Sub:- Submission of Annual Secretarial Compliance Report for the year ended 31st March 2021.

Dear Sir,

Pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, and with reference to SEBI Circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019; we are hereby submitting Annual Secretarial Compliance Report duly issued by Mr. Manish Maheshwari proprietor of M. Maheshwari & Associates Practicing Company Secretaries, for the financial year ended March 31, 2021.

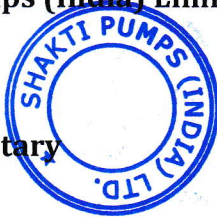
Please take the same on record.

Thanking you,

Yours faithfully

For Shakti Pumps (India) Limited

**Ravi Patidar
Company Secretary**



SHAKTI PUMPS (INDIA) LIMITED

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF SHAKTI PUMPS (INDIA)
LIMITED FOR THE YEAR ENDED MARCH 31, 2021**

To
The Board of Directors
SHAKTI PUMPS (INDIA) LIMITED
CIN: L29120MP1995PLC009327
PLOT NO. 401, 402 & 413 SECTOR III INDUSTRIAL AREA
PITHAMPUR 454774 IN

Sir/Madam

We have examined:

- (a) All the documents and records made available to us and explanation provided by **Shakti Pumps (India) Limited** ("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity www.shaktipumps.com,
- (d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended March 31, 2021 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



- c) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- e) SEBI (Depositories and Participants) Regulations 1996.

The company, during the year, was not required to comply with the following regulations and consequently not required to maintain any books, papers, minute books or other records or file any forms / returns under:

- a) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- b) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- c) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- d) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

and circulars/ guidelines issued thereunder;

And based on the above examination, I hereby report that, during the Review Period, following are the details:

- 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
NOT APPLICABLE			

- 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 my 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 there under:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary, if any
		N.A.		



(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 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Shareholding Pattern for quarter ended December 2018 was to be filed on or before January 21 st 2019 but the same was filed on January 22 nd 2019 with National Stock Exchange of India Ltd. With the penal charges of Rs. 2316.18.	N.A.	The Shareholding Pattern for quarter ended December 2018 was filed on January 22 nd 2019 with National Stock Exchange of India Ltd. With the penal charges of Rs. 2316.18.	Compliance was delayed by a day which was rectified by payment of Penal Charges of Rs. 2316.18 by the company.
2.	Vintex Tools Private Limited, rectified the wrongful purchase by selling those 4500 shares in the open market immediately on next early trading day i.e 13.08.2018	N.A.	The wrongful purchase was rectified by selling those 4500 shares in the open market immediately on next early trading day i.e. 13.08.2018	The non-compliance occurred is not a willful omission. The promoter reversed the transaction and informed to stock exchanges.

For *M. Maheshwari & Associates*
Company Secretaries
 Firms U.C.N. I2001MP213000



Manish Maheshwari

Manish Maheshwari
Proprietor
FCS-5174
CP-3860

Date : 26th June 2021
 Place : Indore
 UDIN : F005174C000520887

Notes: Due to restricted movement amid COVID-19 pandemic, we are providing this secretarial compliance report by examining the Secretarial Records including Minutes, Documents, Registers and other records etc., and some of them received by way of electronic mode from the Company and could not be verified from the original records. The management has confirmed that the records submitted to us are true and correct. This Report is limited to the Statutory Compliances on laws / regulations / guidelines listed in our report of which, the due date has been ended/expired on or before March 31, 2021 pertaining to Financial Year 2020-21.