

**Sun Pharmaceutical Industries Ltd.**

Sun House, Plot No. 201 B/1,  
Western Express Highway, Goregaon (E),  
Mumbai - 400 063, Maharashtra, INDIA.  
Tel. : (91-22) 4324 4324  
Fax : (91-22) 4324 4343  
Website : www.sunpharma.com  
CIN : L24230GJ1993PLC019050



**May 29, 2019**

National Stock Exchange of India Ltd,  
Exchange Plaza, 5th Floor,  
Plot No. C/1, G Block,  
Bandra Kurla Complex,  
Bandra (East),  
Mumbai – 400 051.  
NSE Code: SUNPHARMA

BSE Limited.,  
Market Operations Dept.  
P. J. Towers,  
Dalal Street,  
Mumbai - 400 001.  
Security Code : 524715

Dear Sirs,

**Subject : Submission of Annual Secretarial Compliance Report for the financial year 2018-19**

Pursuant to requirement of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company for the financial year 2018-19 issued by KJB & Co. LLP, Practicing Company Secretaries with Nil deviation.

This is for your information and records.

Yours faithfully,  
**For Sun Pharmaceutical Industries Ltd**

**Ashok I. Bhuta**  
**Compliance Officer**  
Encl: as above

# KJB & CO LLP

COMPANY SECRETARIES

**Secretarial compliance report of  
Sun Pharmaceutical Industries Limited  
for the year ended 31<sup>st</sup> March 2019**

We, KJB & CO LLP, Practising Company Secretaries, have examined:

- all the documents and records made available to us and explanation provided by Sun Pharmaceutical Industries Limited ("**the listed entity**"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- 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 2019 ("**Review Period**") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("**SEBI Act**") and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not applicable to the Company for the period under review;**
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - **Not applicable to the Company for the period under review;**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008- **Not applicable to the Company for the period under review;**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013- **Not applicable to the Company for the period under review;**

and circulars/ guidelines issued thereunder; and based on the above examination, we hereby report that, during the Review Period:

- The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -

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Kandivali West,  
Mumbai - 400 067.

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E info@kjblp.com  
Website www.kjblp.com  
LLPIN AAM-3002

For Sun Pharmaceutical Industries Limited

*A 216*  
Ashok I. Bhuta  
Compliance Officer

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
Nil			

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 Company/ its promoters/ directors 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, debarment, 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 ....	Actions taken by the Company, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
This being the first reporting since the notification of the requirement to submit this report, reporting on the actions to comply with the observations made in previous report does not arise.				

For, KJB & CO LLP,  
Practicing Company Secretary

  
Alpeshkumar Panchal  
Partner  
ACS No.: 49008  
C P No.: 20120  
Place: Mumbai  
Date: 24th May 2019



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For Sun Pharmaceutical Industries Limited

  
Ashok I. Bhuta  
Compliance Officer