



Pharmaceuticals Limited

**Registered & Corporate Office :**  
Plot No. 72, H. No. 8-2-334/3 & 4, Road No. 5,  
Opp. SBI Executive Enclave, Banjara Hills,  
Hyderabad - 500 034, Telangana, INDIA.  
Tel : +91-40-2525 9999, Fax : +91-40-2525 9889  
CIN : L24239TG1987PLC008066  
Email: info@smspharma.com, www.smspharma.com

Date: 23<sup>rd</sup> July, 2020

To,  
The Manager,  
Corporate Filings Department,  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai- 400 001

The Manager,  
Listing Compliance Department,  
National Stock Exchange of India  
Ltd. Exchange Plaza, Plot no. C/1, G  
Block, Bandra-Kurla Complex,  
Bandra (E), Mumbai - 400 051.

**Security Code: 532815**

**Symbol: SMSPHARMA**

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report under Regulation 24A for the financial year 2019-20

Ref: 1) SEBI Circular no. CIR/CFD/CMD1/27/2019, Dt: February 8<sup>th</sup>, 2019.

We are herewith submitting the Annual Secretarial Compliance Report issued by CSB Associates, Mr. C.Sudhir Babu, Practicing Company Secretary in compliance with Regulation 24A of SEBI (LODR) Regulations, 2015 for the financial year 2019-20.

Kindly take the above information on record.

Yours faithfully

For SMS Pharmaceuticals Limited

  
V S Venkatish  
Company Secretary



**CSB Associates**

Company Secretaries

3-6-481, Above Vijaya Bank,  
Street No.6, Himayatnagar,  
Hyderabad - 500 029.

Mobile : 99855 23338  
85001 18567

E-mail : csbassociates27@yahoo.com

**SECRETARIAL COMPLIANCE REPORT OF SMS PHARMACEUTICALS LIMITED  
FOR THE YEAR ENDED MARCH 31, 2020**

To  
SMS Pharmaceuticals Limited,  
Plot No. 72, H.No. 8-2-334/3&4,  
Road No. 5, Opp. SBI Executive Enclave,  
Banjara Hills, Hyderabad - 500034.

We, CSB Associates, Company Secretaries, have examined:

- a) all the documents and records made available to us and explanation provided by SMS Pharmaceuticals Limited ("the Listed Entity"),
- 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 March 31, 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;(there were no events requiring compliance 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; (there were no events requiring compliance during the Review Period)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (there were no events requiring compliance during the Review Period)
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (there were no events requiring compliance during the Review Period)
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (there were no events requiring compliance 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 Participant) Regulations, 2018;

and circulars/ guidelines issued thereunder;

- 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:

Sl. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 40(9) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Late filing of the Certificate with BSE Limited	Compliance Certificate under Regulation 40(9) of SEBI (Listing Obligations and Disclosure Requirements, Regulations, 2015 for the Half Year ended 30 <sup>th</sup> September, 2019, was filed after the due date.

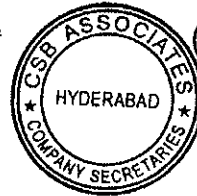
- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.



- 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 in so far as it appears from our examination of those records.
- d) The reporting of actions by the listed entity to comply with the observations made in previous reports is not applicable during the Review Period.

For CSB Associates,  
Company Secretaries,

Place: Hyderabad  
Date: 5<sup>th</sup> June, 2020



A handwritten signature in black ink, appearing to read "C. Sudhir Babu".

C. Sudhir Babu,  
Proprietor,  
FCS: 2724, CP: 7666.  
UDIN:F002724B000320767