



Date:-30.05.2019

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

Sub:- Compliance under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir,

In terms of Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose Secretarial Compliance Report duly issued by M. Maheshwari & Associates Practicing Company Secretary, for the financial year ended March 31, 2019.

Please take the same on record.

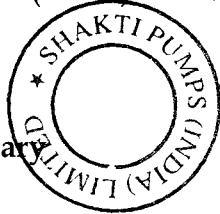
Thanking you,

Yours faithfully

For Shakti Pumps (India) Limited

Ravi Patidar

Company Secretary



SHAKTI PUMPS (INDIA) LIMITED

**Secretarial compliance report of
SHAKTI PUMPS (INDIA) LIMITED for the year ended March 31, 2019**

I Manish Maheshwari have examined:

- (a) all the documents and records made available to us and explanation provided by M/s 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,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended March 31, 2019 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;

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;

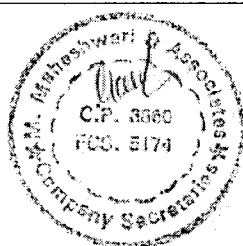
and circulars/ guidelines issued thereunder;

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
1.	Regulation 31(1) of the Securities and Exchange Board of India (Listing Obligations And Disclosure requirements Regulation 2015).	The Company has filed the Shareholding Pattern for the Quarter ended December 2018 with National Stock Exchange India Ltd. after the period specified under Regulation 31(1) of the Securities and Exchange Board of India (Listing Obligations And Disclosure requirements Regulation 2015).	The Company has Complied the same.
2.	Clause 4 of Schedule B of SEBI (Prohibition of Insider Trading) Regulations 2015. Designated Person and their immediate relatives shall not trade during the period of closure of the trading window.	Vintex Tools Private Limited, the Company belonging to the Promoter Group has purchased 4500 shares on 13.08.2019 by oversight, i.e. in between closure of trading window period from 08.08.2018 to 18.08.2018.	The Company inform to the Stock Exchanges regarding the purchase of shares due to oversight and also rectified the same.



- 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
1.	National Stock Exchange of India Ltd.	One day delay in Filing Shareholding Pattern under Regulation 31(1) of the Securities and Exchange Board of India (Listing Obligations And Disclosure requirements Regulation 2015). to NSE Ltd.	The Company had to pay Penal Charges of Rs 2,316.18.	The Company has paid the Penal Charges of Rs 2,316.18.



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 2018	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

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



Manish Maheshwari

Manish Maheshwari
Proprietor
FCS-5174
CP-3860

Date : 29.05.2019
Place : Indore