



Ref No. GIL/CFD/SEC/22/ 043/SE

24<sup>th</sup> May 2021

**BSE Limited**  
Dalal Street,  
Phiroze Jeejeebhoy Towers,  
Fort, Mumbai - 400 001  
**Scrip Code: 500300**

**The National Stock Exchange of India Limited**  
Exchange Plaza, 5<sup>th</sup> Floor, Plot No. C/1,  
G Block, Bandra- Kurla Complex,  
Bandra (East), Mumbai 400051  
**Symbol: GRASIM**

Dear Sirs,

**Sub: Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March 2021**

In terms of Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report of Grasim Industries Limited, dated 24<sup>th</sup> May 2021, for the financial year ended 31<sup>st</sup> March 2021, issued by BNP & Associates, Company Secretaries.

This is for your information and records.

Thanking you.

Yours sincerely,  
**For Grasim Industries Limited**

Sailesh  
Kumar Daga

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Sailesh Kumar Daga  
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**Sailesh Daga**  
**Company Secretary**

Encl : as above

**Cc: Luxembourg Stock Exchange**  
**Market & Surveillance Dept.,**  
P.O. Box 165, L-2011 Luxembourg,  
Grand Duchy of Luxembourg, EUROPE

**Citibank N.A.**  
Depository Receipt Services  
388 Greenwich Street, 6<sup>th</sup> Floor  
New York, NY 10013

**Citibank N.A.**  
**Custodial Services**  
FIFC, 11<sup>th</sup> Floor, C-54 & 55, G Block  
Bandra Kurla Complex  
Bandra (East), Mumbai 400 098

**Grasim Industries Limited**  
Aditya Birla Centre, 'A' wing, 2<sup>nd</sup> Floor, S.K. Ahire Marg, Worli, Mumbai 400 030, India  
T: +91 22 6652 5000 / 2499 5000 | F: +91 22 6652 5114 / 2499 5114  
E: grasim.secretarial@adityabirla.com | W: www.grasim.com | CIN: L17124MP1947PLC000410

**Regd. Office :** Birlagram, Nagda – 456 331 (M.P.)

**SECRETARIAL COMPLIANCE REPORT OF GRASIM INDUSTRIES LIMITED FOR  
THE YEAR ENDED 31<sup>ST</sup> MARCH 2021**

**To,  
The Board of Directors  
Grasim Industries Limited**

We at BNP & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by Grasim Industries Limited (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchange(s),
- (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 31<sup>st</sup> March 2021 (“Review Period”) in respect of the 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 (Share Based Employee Benefits) Regulations, 2014;
- (d) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (e) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agent) Regulations, 1993 pertaining to the Companies Act, 2013 and

- dealing with client;
- (f) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, and
- (g) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- and circulars/ guidelines issued thereunder;

and based on the above examination, we 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, **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
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 listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchange (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:

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended 31<sup>st</sup> March 2021</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
NA				

**For BNP & Associates  
Company Secretaries  
[Firm Regn. No. P2014MH037400]**

Narasimhan  
Balasubramaniam

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+05'30'

**B. Narasimhan  
Partner  
FCS No.:-1303 / CP No.:- 10440  
PR No.:-637 / 2019  
UDIN:- F001303C000362290**

**Place: Mumbai  
Date: 24<sup>th</sup> May 2021**