



Bal Pharma Limited

To,
The Manager-Listing
National Stock Exchange of India Ltd
Mumbai.

25.05.2022

BSE Limited
Mumbai.

Dear Sir,

Sub : Annual Secretarial Compliance Report.
Ref : Compliance with Regulation 24A of SEBI (LODR)
Regulations,2015.

With reference to the above, we are submitting to the exchanges annual secretarial Compliance report for the financial year ended 31.03.2022, duly certified by the practicing Company Secretary.

Request you to please take the same on record.

Thanking You.

For Bal Pharma Ltd

Authorised Signatory.



PARAMESHWAR G. BHAT

B.Com., LLB, ML, MBA, FCS

Company Secretary

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**SECRETARIAL COMPLIANCE REPORT OF BAL PHARMA LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2022.**

I, Parameshwar G. Bhat, Practising Company Secretary have examined all the documents and records made available to me and explanations provided by BAL PHARMA LIMITED (CIN: L85110KA1987PLC008368) ("the listed entity"), the filings/submissions made by the listed entity to the stock exchanges, website of the listed entity and other document/filing and as may be relevant, which has been relied upon to make this certification for the Financial Year ended 31st March, 2022 ("1st April, 2021 to 31st March, 2022") in respect of compliance with the provisions of:

- (a) Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) 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;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;



- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and
- (j) Circulars/Guidelines issued thereunder;

Based on the above examination, I hereby report that, during the Review Period:

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

Sl. No.	Compliance Requirement (Regulations/circulars/Guidelines including specific clause)	Deviations	Observations/Remarks of the Practising Company Secretary
NIL*			

*With relation to regulation 3 (5) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Listed Entity represented that it has robust prevailing system for tracking of sharing the Un-published Price Sensitive Information (UPSI) and is in the process of establishing Structured Digital Database (SDD) in software format.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under insofar as it appears from my examination of those records.
- (c) As per the documents provided before me, 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 there under.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports –

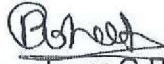
Sl. No.	Observations	of	Observations	Actions	Comments of the
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	the Practising Company Secretary in the previous reports	made in the Secretarial Compliance Report for the year ended	taken by the listed entity, if any	Practising Company Secretary on the actions taken by the listed entity
NIL				

Place: Bengaluru
Date: 26.05.2022




Parameshwar G Bhat
Company Secretary
FCS: 8860 CP: 11004
UDIN: F008860D000398447