



Ref: STEX/SECT/2021

May 27, 2021

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| The Relationship Manager, DCS-CRD BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai 400 001 BSE Scrip Code: 500480 | National Stock Exchange of India Limited Exchange Plaza, 5 th Floor, Plot No. C/1, G Block, Bandra – Kurla Complex, Bandra (East), Mumbai 400 051 NSE Symbol: CUMMINSIND |
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Subject: Annual Secretarial Compliance Report for the year ended March 31, 2021.

Dear Sir/ Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the annual secretarial compliance report for the year ended March 31, 2021 issued by Pramod S. Shah and Associates, Practicing Company Secretaries.

Kindly take this submission on your record.

Thanking you,

Yours faithfully,
For Cummins India Limited

Vinaya A. Joshi
Company Secretary & Compliance Officer

Encl.: As above.

(This letter is digitally signed)

Pramod S. Shah & Associates

Practising Company Secretaries

3rd Floor, LA-SHEWA Bldg., Next to Fedex, 233, P. D' Mello Road, Opp. St. George Hospital, Near CST, Mumbai - 400 001.
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ANNUAL SECRETARIAL COMPLIANCE REPORT OF CUMMINS INDIA LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021

We, Pramod S. Shah & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by Cummins India Limited (“the Listed Entity”);
- (b) the filings/ submissions made by the listed entity to the stock exchanges;
- (c) the website of the listed entity;
- (d) such other documents/ filings, as may be relevant, which has been relied upon to make this certification;

for the year ended 31st March, 2021 (“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 there under; 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;
Not applicable 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:
Not applicable during the review period;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:

Not applicable during the review period;

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008:

Not applicable during the review period;

- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013:

Not applicable during the review period;

- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

- (i) Any other regulations and circulars/ guidelines issued thereunder; as may be applicable to the Company.

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 in so far 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 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 eg. Fines, warning letter, debarment, etc | Observations/ Remarks of the Practicing Company Secretary |
|---------|-----------------|----------------------|---|---|
| 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 previous reports | Observations made in the secretarial compliance report for the year ended... <i>(The years are to be mentioned)</i> | Action taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|--------|--|--|---|--|
| NIL | | | | |

We would like to state that due to lockdown and restrictions on commute imposed by the Government of India or such other state/local authorities in view of COVID-19 pandemic, we have not been able to physically verify the records of the Company for the purpose of our current audit and have placed our reliance solely on the records, documents, papers, information, explanation provided us by the Company and its Officers and agents in electronic form.

**Pramod S. Shah & Associates
(Practicing Company Secretaries)**

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Digitally signed by
PRAMOD SHANTILAL
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Date: 2021.05.19
18:14:23 +05'30'

**Pramod S. Shah - Partner
Pramod S. Shah & Associates
Membership No: FCS 334
C.P No: 3804
UDIN: F0003345C000341576**

**Place: Mumbai
Date: 19.05.2021**