



Date:-30.07.2020

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.

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

Sub:- Submission of Annual Secretarial Compliance Report for the year ended 31st March 2020.

Dear Sir,

Pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, and with reference to SEBI Circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019; we are hereby submitting Annual Secretarial Compliance Report duly issued by M. Maheshwari & Associates Practicing Company Secretary, for the financial year ended March 31, 2020.

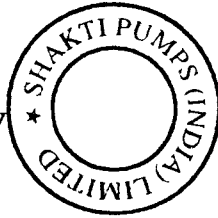
Please take the same on record.

Thanking you,

Yours faithfully

For Shakti Pumps (India) Limited

Ravi Patidar
Company Secretary



SHAKTI PUMPS (INDIA) LIMITED

M. Maheshwari & Associates
Company Secretaries

Manish Maheshwari
M.Com, LL.B., F.C.S.

301 Shalimar Corporate Centre,
8-B South Tukoganj,
Indore - 452 001
P. 0731 4068730
Cell. 98260 40473
mmaheshwarics@gmail.com

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF SHAKTI PUMPS (INDIA)
LIMITED FOR THE YEAR ENDED MARCH 31, 2020**

To
The Board of Directors
SHAKTI PUMPS (INDIA) LIMITED
CIN: L29120MP1995PLC009327
PLOT NO. 401, 402 & 413 SECTOR III INDUSTRIAL AREA
PITHAMPUR 454774 IN

Sir/Madam

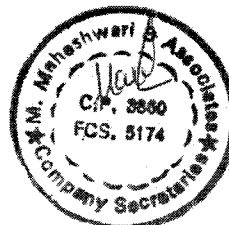
We, M/s. M. Maheshwari & Associates, Company Secretaries, have examined:

- (a) All the documents and records made available to us and explanation provided by **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 www.shaktipumps.com,
- (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 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;

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- 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;
- e) SEBI (Depositories and Participants) Regulations 1996.

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;

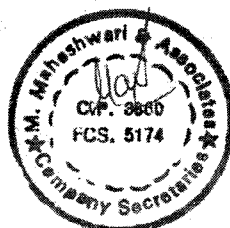
And based on the above examination, I hereby report that, during the Review Period, following are the details:

- 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
		N.A.	

- 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
		N.A.		

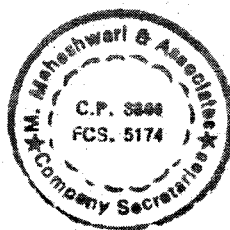


(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	The Shareholding Pattern for Quarter ended December 2018 was to be filed on or before January 21 st 2019 but the same was filed on January 22 nd 2019 with National Stock Exchange of India Ltd. with the Penal Charges of Rs 2,316.18.	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 Shareholding Pattern for Quarter ended December 2018 was filed on January 22 nd 2019 with National Stock Exchange of India Ltd. with the Penal Charges of Rs 2,316.18.	Compliance was delayed by a day which was rectified by payment of Penal Charges of Rs. 2316.18 by the company.
2	Vintex Tools Private Limited, rectified the wrongful purchase by selling those 4500 shares in the open market immediately on next early trading day i.e 13.08.2018.	Vintex Tools Private Limited, the Company belonging to the Promoter Group has purchased 4500 shares on 13.08.2019 by oversight, i.e. after the closure of trading window from 08.08.2018 to 18.08.2018.	The wrongful purchase was rectified by selling those 4500 shares in the open market immediately on next early trading day i.e 13.08.2018.	The non-compliance occurred is not a willful omission. The promoter reversed the transaction and informed to stock exchanges.

*The report is subject to the information made available by the Company during the restrictions applied due to 'COVID-19'.

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



Manish Maheshwari
 Manish Maheshwari
 Proprietor
 FCS-5174
 CP-3880

Date : 29.07.2020
 Place : Indore
 UDIN : F005174B000525531