



N. J. BHATIA
COMPANY SECRETARY

C-93, Snehadhara, Dadabhai Cross Road No. 3, Vile Parle (W), Mumbai - 400 056.
Cell : 9870002130 E-mail : njbhatia@rediffmail.com / njbhatia21@gmail.com

SECRETARIAL COMPLIANCE REPORT

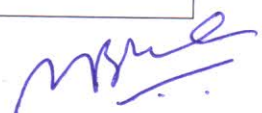
OF LUPIN LIMITED FOR THE YEAR ENDED MARCH 31, 2022

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|---|--|
| I, Ms. Neena J. Bhatia, Company Secretary in practice have examined: - | |
| a. | all documents and records made available to me and explanations provided by Lupin Limited; |
| b. | filings/submissions made by Lupin Limited to the Stock Exchanges; |
| c. | website of Lupin Limited; and |
| d. | such other document/filing, as may be relevant, which has been relied upon to make this certification. |
| for the year ended March 31, 2022 ('Review Period') in respect of compliance with the provisions of: - | |
| a. | the Securities and Exchange Board of India Act, 1992 ('SEBI Act') and Regulations, circulars, guidelines issued thereunder; and |
| b. | the Securities Contracts (Regulation) Act, 1956 ('SCRA'), Rules made thereunder and Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ('SEBI'). |
| Specific Regulations, whose provisions and circulars/guidelines issued thereunder, have been examined, include: - | |
| a. | SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015; |
| b. | SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018; |
| c. | SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; |
| d. | SEBI (Prohibition of Insider Trading) Regulations, 2015; |
| e. | SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; |
| f. | SEBI (Depositories and Participants) Regulations, 2018; |
| g. | SEBI (Investor Protection and Education Fund) Regulations, 2009; |
| h. | SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 and SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) (Amendment) Regulations, 2018; and |
| i. | SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 |
| and circulars/ guidelines issued thereunder; | |
| and based on the above examination, I hereby report that, during the Review Period: - | |

NEENA BHATIA
COMPANY SECRETARY
C-93, Snehadhara,
Dadabhai Cross Road No. 3,
Vile Parle (W), Mumbai - 400 056.
FCS 9492 CP No. 2661

| a. Lupin Limited has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of matters specified below: - | | | | | | | | | | | | | | | | |
|--|---|--|---|--|---------|---|--|---|--|----------------|----------------|--|--|--|--|--|
| <table border="1"> <thead> <tr> <th>Sr. No.</th> <th>Compliance Requirement (Regulations/circulars/guidelines including specific clause)</th> <th>Deviations</th> <th colspan="2">Observations/Remarks of the Practicing Company Secretary</th> </tr> </thead> <tbody> <tr> <td colspan="5" style="text-align: center;">Not Applicable</td> </tr> </tbody> </table> | | | | | Sr. No. | Compliance Requirement (Regulations/circulars/guidelines including specific clause) | Deviations | Observations/Remarks of the Practicing Company Secretary | | Not Applicable | | | | | | |
| Sr. No. | Compliance Requirement (Regulations/circulars/guidelines including specific clause) | Deviations | Observations/Remarks of the Practicing Company Secretary | | | | | | | | | | | | | |
| Not Applicable | | | | | | | | | | | | | | | | |
| b. Lupin Limited has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from my examination of those records. | | | | | | | | | | | | | | | | |
| c. The following are the details of actions taken against Lupin Limited/ 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: | | | | | | | | | | | | | | | | |
| <table border="1"> <thead> <tr> <th>Sr no</th> <th>Action taken by</th> <th>Details of violation</th> <th>Details of action taken E.g. fines, warning letter, debarment, etc.</th> <th colspan="2">Observations/ remarks of the Practicing Company Secretary, if any.</th> </tr> </thead> <tbody> <tr> <td colspan="6" style="text-align: center;">Not Applicable</td> </tr> </tbody> </table> | | | | | 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. | | Not Applicable | | | | | |
| 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. | | | | | | | | | | | | |
| Not Applicable | | | | | | | | | | | | | | | | |
| d. Lupin Limited has taken the following actions to comply with the observations made in previous reports: | | | | | | | | | | | | | | | | |
| <table border="1"> <thead> <tr> <th>Sr. No.</th> <th>Observations of the Practicing Company Secretary in the previous reports</th> <th>Observations made in the secretarial compliance report for the year ended March 31, 2022</th> <th>Actions taken by the listed entity, if any</th> <th colspan="2">Comments of the Practicing Company Secretary on the actions taken by the listed entity</th> </tr> </thead> <tbody> <tr> <td colspan="6" style="text-align: center;">Not Applicable</td> </tr> </tbody> </table> | | | | | Sr. No. | Observations of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended March 31, 2022 | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity | | Not Applicable | | | | | |
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| Not Applicable | | | | | | | | | | | | | | | | |
| I have conducted online verification and examination of records, as facilitated by the Company due to COVID 19 and subsequent lockdown for the purpose of issuing this Report. I have taken declaration from the management regarding the said compliances. | | | | | | | | | | | | | | | | |

Place: Mumbai,
Date: May 18, 2022
UDIN: F009492D000337633


Ms. Neena Bhatia
(Company Secretary)
FCS No: 9492
CP. No.: 2661

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