



Secretarial Compliance Report of GLENMARK PHARMACEUTICALS LIMITED, for the year ended March 31, 2022

The Board of Directors,
Glenmark Pharmaceuticals Limited
CIN: L24299MH1977PLC019982
Mumbai

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

- a) all the documents and records made available to us and explanation provided by **Glenmark Pharmaceuticals Limited, ("the Company")**,
- b) the filings/ submissions made by the Company to the stock exchanges,
- c) website of the Company,
- d) any 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 :
 - i. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - ii. 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 as amended from time to time, 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) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable to the Company 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 to the Company during the review period since there was no Buyback of Securities)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2021





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- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company 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 to the Company during the review period)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the review period;

- (a) The Company 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 |
|-------|--|------------|---|
| None | | | |

- (b) The Company 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 Company/ 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 E.g. fines, warning letter, debarment, etc. | Observations/ Remarks of the Practicing Company Secretary, if any |
|-------|-----------------|----------------------|---|---|
| None | | | | |





S. S. Rauthan & Associates

Company Secretaries



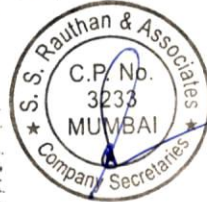
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B.Com., F.C.S.

- (d) The Company 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 (The years are to be mentioned) | Actions taken by the Company, if any. | Comments of the Practicing Company Secretary on the actions taken by the Company |
|----------------|--|--|---------------------------------------|--|
| Not Applicable | | | | |

For S. S. Rauthan & Associates
Company Secretaries
Firm Registration No.: S1999MH026900


CS Surjan Singh Rauthan
Proprietor



M. No. FCS-4807, COP No.3233
Peer Reviewed Cert. No. : 1840/2022
UDIN: F004807D000400994
Place: Mumbai
Date: May 27, 2022