

**Date:** 11<sup>th</sup> May, 2021

**To,**  
**The General Manager,**  
**National Stock Exchange of India Limited**

Exchange Plaza, C-I Block G,  
Bandra Kurla Complex, Bandra (East),  
Mumbai 400051

**NSE Scrip Symbol: MAHEPC**

**To,**  
**The General Manager,**  
**Bombay Stock Exchange Limited,**

Phiroze Jeejeebhoy Towers,  
Dalal Street, Kala Ghoda,  
Fort, Mumbai- 400 001

**BSE Scrip Code: 523754**

**Sub.: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019 - Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2021.**

Dear Sir/ Madam,

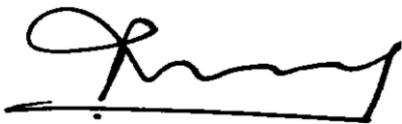
With reference to the above subject, we enclose herewith the Annual Secretarial Compliance Report dated 11<sup>th</sup> May, 2021 for the financial year ended on 31<sup>st</sup> March, 2021 issued by Makarand M. Joshi & Co., Practicing Company Secretary, Mumbai.

You are requested to take the above information on record.

Thanking you.

Yours faithfully,

For **Mahindra EPC Irrigation Limited**



**Ratnakar Nawghare**  
**Company Secretary and Compliance Officer**

# MAKARAND M. JOSHI & CO.

## Company Secretaries

Ecstasy, 803-804, 8<sup>th</sup> Floor, City of Joy, JSD Road, Mulund (W), Mumbai- 400080 (T) 21678100

### Secretarial Compliance Report of Mahindra EPC Irrigation Limited For Financial year ended 31<sup>st</sup> March, 2021

To,  
The Members,  
**Mahindra EPC Irrigation Limited,**  
Plot No.H-109, MIDC AMBAD,  
Nashik MH 422010 In

We, M/s. Makarand M. Joshi & Co., Practicing Company Secretaries, have examined:

(a) all the documents and records made available to us and explanation provided by Mahindra EPC Irrigation Limited ('the listed entity'),

(b) the filings/ submissions made by the listed entity to the Stock Exchanges,

(c) website of the listed entity,

(d) any other document/filing, as may be relevant, which has been relied upon to make this certification, for the year ended 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 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Company during the Audit 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 Audit Period)**
- 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; **(Not Applicable to the Company during the Audit 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 Audit Period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;
- j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 **(Not applicable to the Company during the Audit Period)**

and circulars/ guidelines issued thereunder. Further, in terms of SEBI circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 in respect of Resignation of statutory auditors from listed entities and their material subsidiaries, the listed entity has suitably modified the terms of appointment of the auditor to give effect to clause 6(A) and 6(B) of the said circular

and based on the above examination, we hereby report that, during the audit 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:

Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Remarks of the Practicing Company Secretary
Not Applicable		

(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 <i>E.g. fines, warning letter, debarment, etc.</i>	Observations/ remarks of the Practicing Company Secretary, if any.
Not Applicable				

(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

**For Makarand M. Joshi & Co.  
Practicing Company Secretaries**

Digitally signed by MAKARAND MADHUSUDAN JOSHI  
DN: cn=MAKARAND MADHUSUDAN JOSHI, c=IN,  
st=Maharashtra, o=Personal,  
serialNumber=bea4609e399287838241404700ee8d3949  
se#Roads642ce597e3350b8877ca803f  
Date: 2021.05.11 19:31:19 +05'30'

**Makarand Joshi  
Partner**

FCS No. 5533

CP No. 3662

UDIN: F005533C000278905

Peer review No:P2009MH007000

Place: Mumbai

Date: 11-05-2021