

May 26, 2021

National Stock Exchange of India Limited  
"Exchange Plaza",  
Bandra – Kurla Complex,  
Bandra East  
Mumbai – 400 051  
**NSE Symbol: AMARAJABAT**

BSE Limited  
Corporate Relations Department,  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai – 400 001  
**BSE SCRIP CODE: 500008**

Dear Sirs,

**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021**

Pursuant to Regulation 24A of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, we enclose herewith Secretarial Compliance Report for the year ended March 31, 2021.

We request you to take on record the same.

With regards,

**For Amara Raja Batteries Limited**

**Vikas Sabharwal**  
**Company Secretary**

Encl.: as above

**Secretarial compliance report of AMARA RAJA BATTERIES LIMITED for the  
year ended 31<sup>st</sup> March 2021**

We, **R.SRIDHARAN & ASSOCIATES, Company Secretaries** have examined:

- a) all the documents and records made available to us and explanation provided by **AMARA RAJA BATTERIES LIMITED, CIN: L31402AP1985PLC005305 ("listed entity")** having its Registered office at **RENIGUNTA, CUDDAPAH ROAD, KARAKAMBADI, TIRUPATI, ANDHRA PRADESH - 517520.**
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity (website address: **www.amararajabatteries.com**)
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended **31<sup>st</sup> March 2021** 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 there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 year under review);
- 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 year under review);
- e) Securities Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not applicable during the year under review);
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable during the year under review);
- g) Securities and Exchange Board of India (Issue and listing of Non- Convertible and redeemable Preference shares) Regulations, 2013 (Not applicable during the year under review);







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- 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;
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued there under;

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under except the following:-

Sr. No	Compliance Requirement (Regulations/circulars/ guidelines including specific clauses	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 30 (6) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The outcome of the Board Meeting with respect to financial results held on 30 <sup>th</sup> May, 2020 to the Stock Exchanges and 27 <sup>th</sup> October, 2020 to The National Stock Exchange of India Limited was not filed within 30 minutes from the conclusion of the Board Meeting.	As informed by the Company, the financial results were not filed within 30 minutes from the conclusion of the Board Meeting due to technical glitches.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of those records.
- (c) There were no actions taken against the listed entity/ its promoters/ directors/ material subsidiaries (Not applicable to this company) 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 except as reported hereunder:

The National Stock exchange of India Limited and BSE Limited vide their letter dated 02<sup>nd</sup> July, 2020 levied a fine of Rs.1,82,900/- (Rupees One lakh eighty-two thousand nine hundred only) each for non-compliance of Regulation 17 (1) (c) of the Listing Regulations







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for the period from 1<sup>st</sup> January, 2020 to 31<sup>st</sup> January, 2020 which was paid by the listed entity. The listed entity at its Board meeting held on February 1, 2020 appointed Dr. Ramadevi Gourineni as an additional director and complied with Regulation 17(1)(c) of Listing Regulations.

- (d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the review period:

S. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any.	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	As per Regulation 17 (1)(c) of the SEBI Listing Obligations and Disclosures Requirements Regulations, 2015 (Listing Regulations), the Board of Directors of the listed entity shall comprise of not less than six directors. It was observed during the Financial Year 2019-2020 that the term of Mr. Nagarjun Valluripalli, Independent Director expired on 5 <sup>th</sup> August, 2019. Consequently, the number of the directors reduced below six (6). The Board comprised of	Nil	The listed entity at its Board meeting held on 1 <sup>st</sup> February, 2020 appointed Dr. Ramadevi Gourineni as an additional director and complied with Regulation 17 (1) (c) of Listing Regulations.	The National Stock exchange of India Limited and BSE Limited vide their letter No.NSE/LIST-SOP/CG/FINES /1000977 dated 3rd February, 2020 and No.LST/COMP/R eg.27(2) & Reg. 17 to 21/Dec-19/S00008/283 /2019-20 dated 3rd February, 2020 respectively levied a fine of Rs.3,06,800/- each for the period from 10 <sup>th</sup> November, 2019 to 31 <sup>st</sup>





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	only five (5) directors during the period from 9 <sup>th</sup> November, 2019 to 31 <sup>st</sup> January, 2020.			December, 2019, which was paid by the listed entity on 11 <sup>th</sup> and 10 <sup>th</sup> February, 2020 respectively.
2.	As per CIRCULAR NO.CIR/CFD/CMD1/27/2019 dated 8 <sup>th</sup> February, 2019, every listed entity shall submit the annual secretarial compliance report within 60 days of the end of the financial year.	Nil	The listed entity submitted the above said report on 6 <sup>th</sup> June, 2019.	For the Financial Year ended 31 <sup>st</sup> March, 2020, the company had filed the same with Stock Exchanges as per Circular NO.CIR/CFD/CMD1/27/2019 dated 8 <sup>th</sup> February, 2019.

**FOR R.SRIDHARAN & ASSOCIATES**  
**COMPANY SECRETARIES**



**CS R.SRIDHARAN**

**C.P NO.3239**

**FCS.NO.4775**

**UIN: S2003TN063400**

**UDIN:F004775C000097659**

**PLACE : CHENNAI**

**DATE : 15.04.2021**