



**Novartis India Limited**  
Registered Office:  
Inspire BKC  
Part of 601 & 701  
Bandra Kurla Complex  
Bandra (East)  
Mumbai – 400 051  
Maharashtra, India  
Tel +91 22 50243000  
Fax +91 22 50243010  
Email: india.investors@novartis.com  
CIN No. L24200MH1947PLC006104  
Website: www.novartis.in

May 23, 2019

The Secretary  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai 400 001

Dear Sirs,

Sub: Annual Secretarial Compliance Report for the Financial Year 2018-19

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read alongwith SEBI Circular CIR/CFD/CMD 1/27/2019 dated February 8,2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by Mr. K. G. Saraf, Practicing Company Secretary for the Financial Year 2018-19.

Request you to take the same on record as required under the provisions of the said Regulation.

Thanking you

Yours sincerely,

For Novartis India Limited

A handwritten signature in blue ink, appearing to read "Trivikram Guda", written over a blue circular stamp or seal.

Trivikram Guda  
Company Secretary

# SARAF & ASSOCIATES

## COMPANY SECRETARIES

www.sarafandassociates.com

423, Hind Rajasthan Building, 95, Dadasaheb Phalke Road, Dadar (East), Mumbai - 400 014.  
☎ (022) 2413 0371 / 2415 3887 ☎ +91 98203 20072 ✉ kamalax\_saraf@hotmail.com

**Secretarial Compliance Report**  
**For the Financial Year Ended 31<sup>st</sup> March 2019**  
**(Pursuant to SEBI- CIR/CFD/CMD/1/27/2019 Dated February 08, 2019)**

To,

The Members,  
**NOVARTIS INDIA LIMITED**  
**L24200MH1947PLC006104**  
Inspire - BKC, Part of 601 and 701,  
Bandra Kurla Complex, Bandra East,  
Mumbai City 400051

I Mr. **K.G. Saraf**, Practicing Company Secretary (FCS No. 1596, Certificate of Practice No. 642) have examined:

- all the documents and records made available to us and explanation provided by Novartis India Limited ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- 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 2019 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable for the period under review )
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



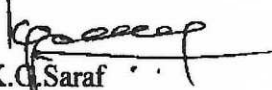
(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practising 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 Practising Company Secretary on the actions taken by the listed entity
This being the first reporting since the notification of the requirements to submit the report, reporting on actions to comply with the observations made in the previous reports do not arise.				

Place : Mumbai  
Date : 21<sup>st</sup> May, 2019

Saraf and Associates  
(Practising Company Secretaries)



  
K.G. Saraf  
Proprietor  
FCS 1596 : CP 642