

May 18, 2021

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

Scrip Code: 513452

Dear Sir,

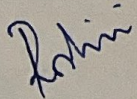
Subject: Submission of Annual Secretarial Compliance Report pursuant to Regulation 24A of the SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015

In compliance with the captioned regulation read with SEBI Circular vide Ref No. CIR/CRD/CMD1/27/2019 dated February 08, 2019, we are submitting herewith the Annual Secretarial Compliance Report issued by M/s. Amresh & Associates, Company Secretaries in Practice, for the financial year 2020-21.

This is for your information and records.

Yours faithfully

For Elango Industries Limited



Roshini Selvakumar

Company Secretary







**ANNUAL SECRETARIAL COMPLIANCE REPORT OF M/s. ELANGO INDUSTRIES  
LIMITED FOR THE YEAR ENDED 31<sup>st</sup> MARCH, 2021**

I Amresh Kumar, Practicing Company Secretary have examined:

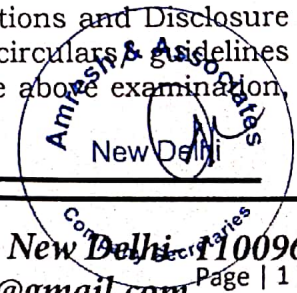
- all the documents and records made available to us and explanation provided by **ELANGO INDUSTRIES LIMITED** ("the listed entity"), [CIN:L27104TN1989PLC017042] having its registered office at No. 5, Ranganathan Garden, 15<sup>th</sup> Main Road Extension, Anna Nagar, Chennai, -600040 the filings/ submissions 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 March 31, 2021 ("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 there under; and
- the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder 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 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;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and its notifications/circulars & guidelines issued there under from time to time and based on the above examination, I/We hereby report that, during the Review Period:

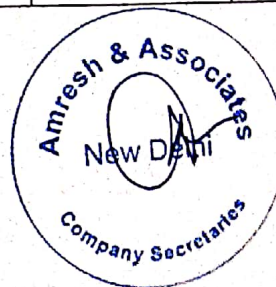


- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, except in respect of matters specified below:-

Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Non-compliance with Regulation 6(1) of SEBI (LODR) Regulations, 2015 for the quarter ended 31 <sup>st</sup> March, 2020 (Appointment of qualified Company Secretary as Compliance Officer	The Company did not have a qualified Company Secretary as Compliance officer from 1 <sup>st</sup> January, 2020 to 20 <sup>th</sup> February, 2020 (50 days)	The Company has appointed a qualified Company Secretary as Compliance officer on 20 <sup>th</sup> February, 2020

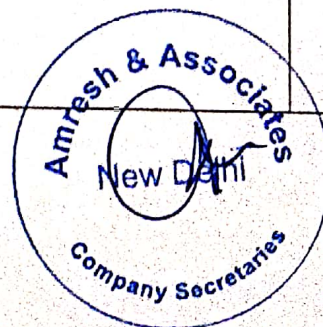
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ 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 there under:

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.
1.	BSE Ltd	Non-compliance with Regulation 6(1) of SEBI (LODR) Regulations, 2015 for the quarter ended 31 <sup>st</sup> March, 2020 (Appointment of qualified Company Secretary as Compliance Officer vide the exchange email dated 4 <sup>th</sup> August, 2020	Fine	The Company has cleared such fine amount dated 1 <sup>st</sup> December, 2020





Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance Report for the year ended 31 <sup>st</sup> March, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	<p>The Company had received Fine Notice for Non- submission of Statement of Investor Complaints under Regulation 13(3) of SEBI (LODR) Regulations 2015 for the Quarter ended June 2019</p> <p>The Company has cleared such fine amount dated 13<sup>th</sup> August, 2019 and replied against such notice vide its letter dated 30<sup>th</sup> July, 2019 stating that the delay in filing was inadvertence and technical.</p>	<p>The Company has received reply from exchange vide its email dated 17<sup>th</sup> February, 2021 informing that company's representation for waiver of fine was placed before the "Committee for Reviewing Representations for Waiver of Fines Levied under Standard Operating Procedure (SOP)" and the same was approved.</p> <p>It was also informed that in case, the company has already paid such fine amount, the same will be adjusted towards Annual Listing Fees / other pending charges / fees payable to the Exchange.</p>	<p>The Company has cleared such fine amount dated 13<sup>th</sup> August, 2019</p> <p>The Company replied against such notice vide its letter dated 30<sup>th</sup> July, 2019 stating that the delay in filing was inadvertence and technical.</p> <p>The Company also has requested the exchange for waiver of fine imposed for late/ Non-compliance with Reg. 13(3)- Investor Complaints</p>	<p>The Company replied against such notice vide its letter dated 30<sup>th</sup> July, 2019 stating that the delay in filing was inadvertence and technical.</p> <p>Further, on receipt of exchange's mail the Company filed the Investors Complaint Report for the quarter ended 30<sup>th</sup> June, 2019 again on 30.07.2019 in order to avoid penal consequence. The details of such compliance were also shared with exchange on 30.07.2019</p>
2.	<p>Non-compliance with Regulation 6(1) of SEBI (LODR) Regulations, 2015 for the quarter ended 31<sup>st</sup> December, 2019 (Appointment of qualified Company Secretary as Compliance Officer</p> <p>The Company has cleared such fine amount dated 5<sup>th</sup> March, 2020</p>	<p>The Company was advised to exercise caution while filling any document with the Exchange and strictly comply with the various circulars of SEBI and the Exchange notices on timely basis.</p>	<p>The Company has cleared such fine amount dated 5<sup>th</sup> March, 2020</p> <p>The Company replied against such notice vide its email dated 5<sup>th</sup> August, 2020 stating that the Company has appointed a qualified Company Secretary as Compliance Officer on 20th February, 2020</p> <p>The Company has also requested in the same letter for waiver of fine Imposed under Regulation 6(1) Non-compliance with requirements to appoint a qualified company secretary as the compliance officer</p>	<p>The Company replied against such notice vide its email dated 5<sup>th</sup> August, 2020 stating that the Company has appointed a qualified Company Secretary as Compliance Officer on 20th February, 2020</p>

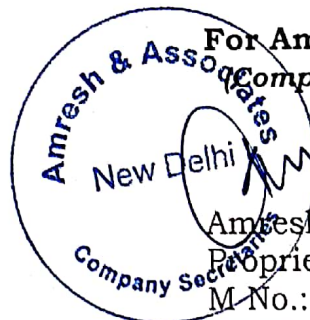
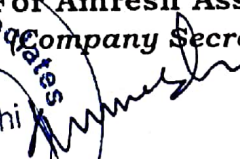


3.	Non-compliance with Regulation 6(1) of SEBI (LODR) Regulations, 2015 for the quarter ended 31 <sup>st</sup> March, 2020 (Appointment of qualified Company Secretary as Compliance Officer vide the exchange email dated 4 <sup>th</sup> August, 2020	The Company's representation for waiver of fine was placed before the "Committee for Reviewing representations for Waiver of Fines Levied under Standard Operating Procedure	The Company has cleared such fine amount dated 1 <sup>st</sup> December, 2020  The Company replied against such notice vide its letter dated 5 <sup>th</sup> August, 2020 stating that the Company has appointed a qualified Company Secretary as Compliance officer.  The Company has also requested in the same letter for waiver of fine imposed under Regulation 6(1) Non-compliance with requirements to appoint a qualified company secretary as the compliance officer	The Company received Regret letter from the exchange dated 19 <sup>th</sup> April, 2021 informing that Company's request for waiver of fines levied under SOP does not fall under any of the carve-outs pursuant to SEBI circular SEBI/HO/CFD/CMD/CIR/P/2018/77 dated May 3, 2018  The Company was advised to exercise caution while filling any document with the Exchange and strictly comply with the various circulars of SEBI and the Exchange notices on timely basis
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Place: New Delhi

Date : 14<sup>th</sup> May, 2021


**For Amresh Associates**  
**(Company Secretaries)**  
  
 Amresh Kumar  
 Proprietor  
 M No.: 32262 CP:22067  
 UDIN: A032262C000335081