

# ELIN ELECTRONICS LIMITED

ELIN HOUSE, 4771, BHARAT RAM ROAD, 23 DARYA GANJ, NEW DELHI-110 002  
Website : [www.elinindia.com](http://www.elinindia.com) Tel. : 91-11-43000400 Fax : 91-11-23289340



May 12<sup>th</sup>, 2023

National Stock Exchange of India Limited  
Exchange Plaza, 5th Floor,  
Plot No. C/1, G Block,  
Bandra - Kurla Complex  
Bandra (E), Mumbai - 400 051

BSE Limited  
Corporate Relationship Department,  
2nd Floor, New Trading Wing,  
Rotunda Building, P.J. Towers,  
Dalal Street, Mumbai - 400 001

Symbol: ELIN

Scrip Code: 543725

ISIN: INE050401020

Dear Sir/Ma'am,

**Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2023.**

Pursuant to the Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/ 2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued by P. P. AGARWAL & CO., Company Secretaries, for the Financial Year ended March 31, 2023.

We request you to take the same on your record.

Thanking You

Yours faithfully,

For Elin Electronics Limited

  
Lata Rani Pawa

Company Secretary & Compliance Officer

M. No.: A30540

[cs@elinindia.com](mailto:cs@elinindia.com)



Factories:-

C-142-143-144-144/1-144/2 Industrial Area, Site No.1, Bulandshahar Road, Ghaziabad - 201009 (U.P.)  
L-84, Verna Industrial Area, Electronic City, Verna, Goa - 403722.

Village: Beli Khol, Post: Manpura - 174101, Teh: Nalagarh, District: Solan (Himachal Pradesh)

Regd. Office: 143, Cotton Street, Kolkata - 700007 • Telefax : 91-33-22685738

CIN : L29304WB1982PLC034725

GSTIN: 09AAACE6449G1ZJ



**SECRETARIAL COMPLIANCE REPORT**  
OF  
**ELIN ELECTRONICS LIMITED**  
For the year ended 31.03.2023

To  
The Members of  
Elin Electronics Limited

We, P.P. Agarwal & Co. have examined:

- (a) All the documents and records made available to us and explanation provided by Elin Electronics Limited ('the listed entity'),
- (b) The filings /submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity, and
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2023 ("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 under them; and
- (b) the Securities Contracts (Regulation) Act, 1956, rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("the 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;



- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018 (Not Applicable during the year);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not Applicable during the year);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not Applicable during the year);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (Not Applicable during the year);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- and circulars/ guidelines issued thereunder;

and based on the above examinations, we hereby report that, during the Review Period the compliance status of the listed entity is appended below:

| S. No. | Particulars  | Compliance Status (Yes/ No/ NA) | Observations/ Remarks |
|--------|--|---------------------------------|-----------------------|
| 1.     | <b><u>Secretarial Standards:</u></b><br>The compliances of listed entities are in accordance with the applicable Secretarial Standards issued by the Institute of Company Secretaries of India ( ICSI)   | Yes                             |                       |
| 2.     | <b><u>Adoption and timely updation of the Policies:</u></b><br>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities<br>• All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI | Yes<br>Yes                      |                       |
| 3.     | <b><u>Maintenance and disclosures on Website:</u></b><br>• The Listed entity is maintaining a functional website<br>• Timely dissemination of the documents/ information   | Yes                             |                       |



|     |  |              |  |
|-----|--|--------------|--|
|     | <p>under a separate section on the website</p> <ul style="list-style-type: none"> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website</li> </ul>  | Yes          |  |
| 4.  | <p><b><u>Disqualification of Director:</u></b><br/>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>   | Yes          |  |
| 5.  | <p><b><u>To examine details related to Subsidiaries of listed entities:</u></b><br/>(a) Identification of material subsidiary companies<br/>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>  | Yes<br>Yes   |  |
| 6.  | <p><b><u>Preservation of Documents:</u></b><br/>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015</p>   | Yes          |  |
| 7.  | <p><b><u>Performance Evaluation:</u></b><br/>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations</p>  | Yes          |  |
| 8.  | <p><b><u>Related Party Transactions:</u></b><br/>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions<br/>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee</p> | Yes<br>N. A. | Prior approval of Audit Committee has been taken for all Related Party Transactions. |
| 9.  | <p><b><u>Disclosure of events or information:</u></b><br/>The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>  | Yes          |  |
| 10. | <p><b><u>Prohibition of Insider Trading:</u></b><br/>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>  | Yes          |  |



|     |  |     |   |
|-----|--|-----|---|
| 11. | <b>Actions taken by SEBI or Stock Exchange(s), if any:</b><br>No Actions taken against the listed entity/ its promoters/directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder | Yes | As informed by the management, no actions were taken against the company/ its promoters/ directors subsidiaries either by SEBI or by Stock Exchanges. |
| 12. | <b>Additional Non-compliances, if any:</b><br>No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.  | Yes |   |

(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:

| S. No. | Compliance Requirement (Regulations/ Circulars/ Guidelines including specific clause) | Regulation/ Circular No. | Deviations | Action taken by | Type of action  | Details of violation | Fine amount | Observation/ Remarks of the Practicing Company Secretary | Management Response | Remarks |
|--------|---|--------------------------|------------|-----------------|---|----------------------|-------------|--|---------------------|---------|
|        |   |                          |            |                 | Advisory/ Clarification / Show Cause Notice/ Warning etc. |                      |             |  |                     |         |
| NIL    |   |                          |            |                 |   |                      |             |  |                     |         |

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

| S. No. | Compliance Requirement (Regulations/ Circulars/ Guidelines including specific clause) | Regulation/ Circular No. | Deviations | Action taken by | Type of action                 | Details of violation | Fine amount | Observation/ Remarks of the Practicing Company Secretary | Management Response | Remarks |
|--------|---|--------------------------|------------|-----------------|--------------------------------|----------------------|-------------|--|---------------------|---------|
|        |   |                          |            |                 | Advisory/ Clarification / Show |                      |             |  |                     |         |



|   |  |  |  |  |                                     |  |  |  |  |  |
|---|--|--|--|--|-------------------------------------|--|--|--|--|--|
|   |  |  |  |  | Cause<br>Notice/<br>Warning<br>etc. |  |  |  |  |  |
| <b>Not Applicable being the First Year of applicability</b> |  |  |  |  |                                     |  |  |  |  |  |

(c) With regard to para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019 dated 18.10.2019, it is certified that there is no change in the Statutory Auditors of the Company during the year under review. M/s. Oswal Sunil & Company, Chartered Accountants, (Firm Registration Number: 016520N), re-appointed as Statutory Auditors of the Company for a second term of 5 consecutive years commencing from the Financial year 2022-23 to hold office from the conclusion of 40<sup>th</sup> Annual General Meeting till the conclusion of the 45<sup>th</sup> Annual General Meeting by the shareholders at their meeting held on 1<sup>st</sup> August, 2022.



For **P. P. Agarwal & Co.**  
Company Secretaries  
U. C. No. S2012DE174200

**Pramod Prasad Agarwal**  
Proprietor

M. No. F4955, C.P. No. 10566  
P. R. C. No. 1241/2021

UDIN: F004955E000288150

Place: New Delhi

Date: 11-05-2023