VIJAY KUMAR MISHRA B. Com. (Hons.), A.C.A., F.C.S. PARESH D PANDYA B. Com., A.C.S.

VKM & ASSOCIATES

PRACTISING COMPANY SECRETARIES

116, Trinity Building, 1st Floor, 227, Dr. C. H. Street, Behind Parsi Dairy, Marine Lines (E), Mumbai - 2.

Tel.: 2207 7267 * Fax: 2207 7542

Mob.: 93229 77388 . E-mail: vkmassociates@yahoo.com

CERTIFICATE UNDER REGULATION 40(9) OF THE LISTING REGULATION FOR THE HALF YEAR ENDED 30th SEPTEMBER, 2018.

We have examined all Share Transfer Deeds, Memorandum of Transfers, Registers, files and other documents relating M/s. NEO INFRACON LIMITED having Registered Office 52/52-A, Nanubhai Desai Road,9,Mulji Thakarsi Building, Sindhi Lane,Mumbai-400004 maintained by M/s. PURVA SHAREGISTRY (INDIA) PVT LTD pertaining to transfer of equity shares of the company for the period from 1st April, 2018 to 30th September, 2018 for the purpose of issuing a Certificate as per Clause 40(9) of the Listing Regulation entered into by, M/s.NEO INFRACON LIMITED with BSE and based on the information provided by the Company, We hereby certify that the Company has delivered during half year ended on 30th September 2018:

A) Share Certificate(s) relating to the transfer of Shares/Debentures received during the period from 1st April, 2018 to 30th September, 2018 as entered in the Memorandum of Transfers have been issued within fifteen days of the date of lodgment for transfer, subdivision, consolidation, renewal, exchange or endorsement of calls/allotment monies from respective date of lodgment of each deed excepting those rejected on technical grounds.

For VKM & ASSOCIATES

Company Secretaries

Place: Mumbai Date: 23/10/2018 ay Kumar Mishra) Partner

C.P.No.4279 M.No.5023