

11<sup>th</sup> May, 2020

To,

The Manager (Listing),  
The BSE Ltd.  
Mumbai

Company's Scrip Code: 505700

**Sub : Compliance Certificate for the half year ended on 31<sup>st</sup> March, 2020 for Senior, Secured, Rated, Listed, Redeemable Non-Convertible Debentures (NCDs)**

**Ref : Regulation 61(4) read with Regulation 40(9) and 40(10) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Dear Sir/Madam,

Pursuant to the subject referred regulations, we hereby submit the Compliance Certificate for the half year ended on 31<sup>st</sup> March, 2020, dated 9<sup>th</sup> May, 2020 received from M/s Spanj & Associates, Practicing Company Secretaries, certifying that all the NCDs issued by the Company are in Demat form and no physical debenture certificate was required to be delivered during the period from 1<sup>st</sup> October, 2019 to 31<sup>st</sup> March, 2020.

You are requested to take the same on your records.

Thanking you.

Yours faithfully,  
For Elecon Engineering Company Limited

Sd/-  
**Bharti Isarani**  
Company Secretary & Compliance Officer  
[blisarani@elecon.com](mailto:blisarani@elecon.com)

Encl.: As above



*Gearing industries. Gearing economies.*

**SPANJ**  
**& ASSOCIATES**  
**Company Secretaries**

**CERTIFICATE UNDER REGULATION 61 (4) READ WITH 40 (9) OF  
SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS  
AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

**FOR THE HALF YEAR ENDED 31<sup>ST</sup> MARCH, 2020**

We have examined all Share Transfer Deeds, Memorandum of Transfers, Registers, files and other documents made available to us in electronic format provided by e-mail to us relating to *Elecon Engineering Company Limited* maintained by *Link Intime India Private Limited* pertaining to physical transfer of 12.25% 100 Non Convertible Debentures (Series I NCDs) of Face Value of Rs. 10,00,000/- each (ISIN 205B07046) of the company for the period from *1<sup>st</sup> October, 2019 to 31<sup>st</sup> March, 2020* for the purpose of issuing a Certificate as per Regulation 61 (4) read with 40 (9) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and based on the information provided by the Company, We hereby certify that the Company was not required to deliver any physical certificates relating to the debentures covered under the present certificates during half year ended on *31<sup>st</sup> March, 2020* on the grounds that :

(A) There was no instance of physical transfer of 12.25% 100 Non Convertible Debentures (Series I NCDs) of Face Value of Rs. 10,00,000/- each (ISIN 205B07046) during the period from *1<sup>st</sup> October, 2019 to 31<sup>st</sup> March, 2020* as the same had been issued to and held by the investors in Dematerialised form

Due to prevailing situation of COVID 19 pandemic and consequential lockdowns declared by each state Government, it was not possible to physically verify the data by us however, on the basis of the information and explanations provided to us and records received in the electronic mode provided by the company as well as Registrar on best effort basis with a disclaimer of difficulties faced by RTA in pandemic situation, for the purpose of our verification, we have verified the details and the present certificate has been issued.

**Place: Ahmedabad**  
**Date: 09<sup>th</sup> May, 2020**

**FOR SPANJ & ASSOCIATES**  
**Company Secretaries**

  
**CS Ashish C. Doshi**  
**Partner**

**COP No.: 2356**  
**UDIN: F003544B000218385**

**SPANJ**  
**& ASSOCIATES**  
**Company Secretaries**

**CERTIFICATE UNDER REGULATION 61 (4) READ WITH 40 (9) OF  
SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS  
AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

**FOR THE HALF YEAR ENDED 31<sup>ST</sup> MARCH, 2020**

We have examined all Share Transfer Deeds, Memorandum of Transfers, Registers, files and other documents made available to us in electronic format provided by e-mail to us relating to *Elecon Engineering Company Limited* maintained by *Link Intime India Private Limited* pertaining to physical transfer of 12.25% 900 Non Convertible Debentures (Series II NCDs) of Face Value of Rs. 10,00,000/- each (ISIN 205B07038) of the company for the period from *1<sup>st</sup> October, 2019 to 31<sup>st</sup> March, 2020* for the purpose of issuing a Certificate as per Regulation 61 (4) read with 40 (9) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and based on the information provided by the Company, We hereby certify that the Company was not required to deliver any physical certificates relating to the debentures covered under the present certificates during half year ended on *31<sup>st</sup> March, 2020* on the grounds that :

(B) There was no instance of physical transfer of 12.25% 900 Non Convertible Debentures (Series II NCDs) of Face Value of Rs. 10,00,000/- each (ISIN 205B07038) during the period from *1<sup>st</sup> October, 2019 to 31<sup>st</sup> March, 2020* as the same had been issued to and held by the investors in Dematerialised form

Due to prevailing situation of COVID 19 pandemic and consequential lockdowns declared by each state Government, it was not possible to physically verify the data by us however, on the basis of the information and explanations provided to us and records received in the electronic mode provided by the company as well as Registrar on best effort basis with a disclaimer of difficulties faced by RTA in pandemic situation, for the purpose of our verification, we have verified the details and the present certificate has been issued.

**Place: Ahmedabad**  
**Date: 09<sup>th</sup> May, 2020**

**FOR SPANJ & ASSOCIATES**  
**Company Secretaries**

  
**CS Ashish C. Doshi**  
**Partner**

**COP No.: 2356**  
**UDIN: F003544B000218396**