

ELANTAS Beck India Ltd.
147 Mumbai-Pune Road, Pimpri, Pune 411018, India

Bombay Stock Exchange Ltd.
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001

**Sub: Submission of Annual Secretarial Compliance Report for the year ended
31 December 2019**

Ref: Company Scrip Code: 500123

Dear Sir,

Pursuant to the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and pursuant to the Regulation 24A of SEBI (LODR) Regulations, 2015 please find enclosed Annual Secretarial Compliance Report for the year 31 December 2019 issued by Prajot Tungare & Associates, Practicing Company Secretaries, Pune.

We request you to kindly take the above on your record.

Kindly acknowledge.

Yours faithfully,
For ELANTAS Beck India Ltd.



Abhijit Tikekar
Head Legal & Company Secretary

Date
09 03 2020

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Registered
Registered Office:
147 Mumbai-Pune Road,
Pimpri, Pune 411018, India
CIN: L24222PN1956PLC134746

SECRETARIAL COMPLIANCE REPORT OF ELANTAS BECK INDIA LIMITED FOR THE YEAR ENDED ON 31 DECEMBER 2019

To,
ELANTAS Beck India Limited
147, Mumbai Pune Road,
Pimpri, Pune - 411 018

We, Prajot Tungare & Associates, Practicing Company Secretaries have examined:

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

for the year ended on 31 December 2019 ("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 thereunder; and
- (b) 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:-

- (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; [not applicable during the Review Period]~~
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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Secretarial compliance report for the financial year ended 31st December 2019



~~(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; [not applicable during the Review Period]~~

~~(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; [not applicable during the Review Period]~~

~~(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; [not applicable during the Review Period]~~

~~(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; [not applicable during the Review Period]~~

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

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 thereunder, 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
NIL			

(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/our 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 thereunder:



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.
NIL				

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

Sr. No.	Observations of the Practicing 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 Practicing Company Secretary on the actions taken by the listed entity
Not applicable considering it is the first year of implementation of this report.				

For Prajot Tungare & Associates
Company Secretaries

CS Prajot Tungare
Partner
FCS: 5484
CP No: 4449
UDIN: F005484A000601354



Date: 9 March 2020
Place: Pune