



Elgi Rubber Company Limited

2000 Trichy Road • Coimbatore 641 005 • India • CIN : L25119TZ2006PLC013144
+91 (422) 232 1000 • info@in.elgirubber.com • www.elgirubber.com

Ref: ERCL/SEC/2021/Jun/05

June 26, 2021

The Manager — Listing,
National Stock Exchange of India Limited,
Exchange Plaza, Bandra Kurla Complex,
Bandra East,
Mumbai — 400 051

Dear Sirs,

Sub : Annual Secretarial Compliance Report for the year ended March 31, 2021 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Symbol : ELGIRUBCO

Pursuant to Regulation 24A of Listing Regulations read with SEBI Circular No.CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2021 issued by a Practicing Company Secretary.

This is for your information and records.

Thank you,

Yours faithfully,
For Elgi Rubber Company Limited

A handwritten signature in black ink, appearing to read 'S R Venkatachalam', written over a horizontal line.

S R Venkatachalam
Chief Financial Officer

**Secretarial Compliance Report of M/s. Elgi Rubber Company Limited
for the year ended 31st March, 2021**

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08.02.2019]

I, **C N Paramasivam (FCS 4654 / CP.No.3687)**, Company Secretary in Practice, have examined:

- all the documents and records made available to us and explanation provided by M/s. Elgi Rubber Company Limited (CIN: L25119TZ2006PLC013144) ("the listed entity");
- the filings/ submissions made by the listed entity to National Stock Exchange of India Limited ("the stock exchange");
- website of the listed entity; and
- any other document/ filing, as may be relevant, which has been relied upon to make this certification.

for the year ended 31st March, 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 thereunder; and
- 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 as applicable to the listed entity, 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and
- circulars/ guidelines issued thereunder;




and based on the above examination, I 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;
- (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) There were no actions taken against the listed entity / its promoters / directors 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;
- (d) There were no concerns raised / observations made in the previous report pertaining to the financial year ended 31st March, 2020 and hence, reporting under this clause (d) does not arise;
- (e) There was no event of appointment / re-appointment / resignation of statutory auditor of the listed entity during the period under review. Further, the terms of appointment of its existing statutory auditor are in compliance of the Para 6(A) and 6(B) of the SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18th October, 2019.

Place : Coimbatore

Date : 10th June, 2021


C N PARAMASIVAM
FCS No.: 4654
C P No.: 3687
UDIN: F004654C000430915

