



## ENKEI WHEELS (INDIA) LIMITED

(CIN - L34300PN2009PLC133702)

Factory & Registered Office: Gat No. 1425 Village Shikrapur, Tal. Shirur, Pune  
Maharashtra, India 412 208. Tel. : +91-2137-618700, Fax : +91-2137-618720  
E-Mail : info@enkei.in, Website : www.enkei.in



**Date:** 1<sup>st</sup> March, 2025.

To  
Corporate Filing Department  
BSE Limited,  
P.J. Towers, Dalal Street,  
Mumbai – 400 001.

**Sub: Submission of Annual Secretarial Compliance Report for the Year ended 31<sup>st</sup>  
December, 2024.**

**Ref:** Scrip Code 533477

Dear Sir/Mam,

In compliance of Regulation 24(A) of SEBI (LODR) Regulations, 2015, Company has appointed M/s. Shailesh Indapurkar & Associates, Company Secretaries, Pune, as Secretarial Auditor for the financial year starting from 01<sup>st</sup> January, 2024 to 31<sup>st</sup> December, 2024. Accordingly they have carried out the secretarial audit and submitted Annual Secretarial Compliance Report.

We are enclosing herewith the copy of the same for your record.

Kindly acknowledge the receipt of same.

Thanking You,

**FOR ENKEI WHEELS (INDIA) LIMITED**

SOURAV  
CHOWDHURY  
RY

Digitally signed by  
SOURAV  
CHOWDHURY  
Date: 2025.03.01  
14:00:22 +05'30'

**SOURAV CHOWDHURY  
COMPANY SECRETARY & COMPLIANCE OFFICER**

**Encl:** As Above

**SECRETARIAL COMPLIANCE REPORT**

**for the year ended 31<sup>st</sup> December 2024**

**Enkei Wheels (India) Limited**

**(CIN L34300PN2009PLC133702)**

We M/s **Shailesh Indapurkar & Associates, Company Secretaries, Pune** have examined:

- (a) all the documents and records made available to us and explanation provided by Enkei Wheels India Limited (Company)
- (b) the filings/ submissions made 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 31<sup>st</sup> December 2024 ("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;
- (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 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations 2021 **(Not applicable during the review period)**;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities,2021)**(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 off Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

and circulars/ guidelines issued thereunder;

and based on the above examination, 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/ Circular/guidelines including specific clause )	Regulation/ Circular No.	Deviations	Actions Taken by	Type of Action	Details of violation	Fine amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
NIL										



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

Sr. No	Compliance Requirement(Regulations/Circular/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Actions Taken by	Type of Action	Details of violation	Fine amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
NIL										

(c) We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<b><u>Secretarial Standards:</u></b>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India.	Yes	Nil



Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
2.	<p><b><u>Adoption and timely updation of the Policies:</u></b></p> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors/ Committees of the listed entities.</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>	Yes	Nil
3.	<p><b><u>Maintenance and disclosures on Website:</u></b></p> <ul style="list-style-type: none"> <li>The Listed entity is maintaining a functional website.</li> <li>Timely dissemination of the documents/ information under a separate section on the website.</li> <li>Web-links provided in annual corporate governance reports under Regulation 27 (2) of Listing Regulations are accurate and specific which redirects to the relevant document(s)/section of the website.</li> </ul>	Yes	Nil
4.	<p><b><u>Disqualification of Director:</u></b></p> <p>None of the Directors of the listed entity are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	Nil



Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
5.	<p><b><u>Details related to Subsidiaries of listed entity have been examined w.r.t.:</u></b></p> <p>(a) Identification of material subsidiary companies. (b) Disclosure requirements of material as well as other subsidiaries.</p>	NA	Nil
6.	<p><b><u>Preservation of Documents:</u></b></p> <p>As per the confirmations given by the listed entity, and on our test check basis, listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records is as per Policy of Preservation of Documents and Archival policy prescribed under Listing Regulations.</p>	Yes	Nil
7.	<p><b><u>Performance Evaluation:</u></b></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees on an annual basis as prescribed in SEBI Regulations.</p>	Yes	Nil
8.	<p><b><u>Related Party Transactions</u></b></p> <p>a. The listed entity has obtained prior approval of Audit Committee for all Related party transactions. 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	Nil



Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
9.	<p><u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of Listing Regulations within the time limits prescribed thereunder.</p>	Yes subject to observation	<p>1. Intimation to stock exchange of expiry of tenure of appointment of Mrs. Smita Patil Independent Director dated 30<sup>th</sup> May 2024 was informed with some delay to stock exchange on 4<sup>th</sup> June 2024</p> <p>2. Intimation to Stock Exchange of Resignation of Jitendra Parmar, CFO: change of KMP was submitted within statutory time. However resignation letter dated 11<sup>th</sup> June 2024 from KMP was submitted on 23 September 2024.</p>
10.	<p><u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3 (5) &amp; 3 (6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	Nil
11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u>  No Actions have been 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.</p>	Yes	Nil



Sr No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
12.	<p><b><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></b></p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section VD of chapter V of the Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 on compliance with the provisions of the SEBI LODR by listed entities.</p>	NA	No resignation of statutory auditor during the year 2024
13.	<p><b><u>Additional non-compliances, if any:</u></b></p> <p>No additional non-compliance observed for any SEBI regulation/circular/guidance note, etc.</p>	Yes	Nil

For Shailesh Indapurkar & Associates  
Company Secretaries



CS Shailesh Indapurkar  
Proprietor  
ACS 17306  
C. P. No: 5701  
Place: Pune  
Date: 25<sup>th</sup> February 2025  
UDIN: A017306F004002650



Note: This report is to be read with letter of even date by the secretarial auditors which is annexed as Annexure A and forms part of this report



Annexure A

To,  
The Members  
Enkei Wheels (India) Limited

Our Report of even date is to be read along with this letter.

**Management's Responsibility**

It is the responsibility of the management of the Company to maintain secretarial records, devise proper systems to ensure compliance with the provisions of all applicable laws and regulations and to ensure that the systems are adequate and operate effectively.

**Auditor's Responsibility**

1. Our responsibility is to express an opinion on these secretarial records, standards and procedures followed by the Company with respect to secretarial compliances.
2. We believe that audit evidence and information obtained from the Company's management is adequate and appropriate for us to provide a basis for our opinion.
3. We have relied on the documents and evidences provided physically and through electronic mode.
4. Wherever required, we have obtained the management's representation about the compliance of laws, rules and regulations and happening of events, etc.

**Disclaimer**

5. The Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.
6. We have not verified the correctness and appropriateness of financial records and books of accounts of the Company

**For Shailesh Indapurkar & Associates**  
**Company Secretaries**



**CS Shailesh Indapurkar**  
**Proprietor**  
**ACS 17306**  
**C. P. No: 5701**  
**Place: Pune**  
**Date: 25<sup>th</sup> February 2025**  
**UDIN: A017306F004002650**

