

28th May, 2021

The BSE Limited

Corporate Relationship Department
Floor 1, New Trading Ring
Rotunda Building, P.J. Towers
Dalal Street, Fort
Mumbai 400 001.
Scrip Code - 520057

National Stock Exchange of India Ltd.

Exchange Plaza, 5th Floor,
Plot No. C/1, G Block
Bandra - Kurla Complex
Bandra (E)
Mumbai 400 051.
Symbol - JTEKTINDIA; Series - EQ

Sub : Annual Secretarial Compliance Report for the year ended March 31, 2021

Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, we are forwarding herewith the Annual Secretarial Compliance Report for the financial year 2020-21. You are requested to kindly take the above information on records. The report will also be hosted on the Company's website at <https://jtekt.co.in>.

Thanking you,

Yours faithfully,
For **JTEKT INDIA LIMITED**

**Nitin
Sharma**

Digitally signed by Nitin Sharma
DN: cn=N, o=Personal,
postalCode=122505, st=Haryana,
serialNumber=4db14bb2ce45966cf
47d435c82dc344670180378e6759
bc92d6d626294edf83f, cn=Nitin
Sharma
Date: 2021.05.28 10:51:15 +05'30'

NITIN SHARMA
COMPANY SECRETARY

Regd. Office : UGF-6, Indra Prakash 21, Barakhamba Road, New Delhi - 110 001, India.

Tel : +91 11 2331 1924 / 2332 7205, Telefax : +91 11 2332 7205
CIN : L29113DL1984PLC018415, **Website :** www.jtekt.co.in

Works : 38/6, Delhi-Jaipur Road, NH-8, Gurugram - 122 001, Haryana, India.
Tel : +91 124 468 5000, **Fax :** +91 124 410 4611 / 410 4621.



SECRETARIAL COMPLIANCE REPORT OF JTEKT INDIA LIMITED (Formerly known as SONA KOYO STEERING SYSTEMS LIMITED) (CIN: L29113DL1984PLC018415) FOR THE YEAR ENDED 31 MARCH 2021

[Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended vide SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019]

We, have examined:

- (a) all the documents and records made available to us and explanation provided by JTEKT 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 31 March 2021 (“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 since there were no events requiring compliance 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 since there were no events requiring compliance during the Review Period***);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (***Not Applicable since there were no events requiring compliance during the Review Period***);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008(***Not Applicable since there were no events requiring compliance 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 since there were no events requiring compliance 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, 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,
- (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 was no event of appointment/re-appointment/resignation of statutory Auditor of the listed entity and listed entity has modified the term of appointment of its existing auditor and has complied with SEBI Circular no. CIR/CFD/CMD1/114/2019 dated October 18, 2019.
- (d) There were no 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,
- (e) The listed entity has taken the following actions to comply with the observations made in previous reports. (This reporting does not arise during the Review Period).


Place: New Delhi

Date: 26th May, 2021

UDIN: F008493C000374848



**For KKS & ASSOCIATES
Company Secretaries**


**Krishna Kumar Singh
Proprietor
M. No. 8493**

'Annexure A'

To,
The Members,
JTEKT India Limited, (Formerly known as Sona Koyo Steering Systems Limited)
UGF-6, Indra Prakash, 21, Barakhamba Road, New Delhi-110001

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

- a. Maintenance of Secretarial record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.
- b. We have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in Secretarial records. We believe that the process and practices, we followed provide a reasonable basis for our opinion.
- c. In view of lockdown due to COVID-19, we have conducted our verification and examination of the records/documents provided by company through email and/or other digital mode.
- d. Where ever required, we have obtained the Management representation about the Compliance of laws, rules and regulations and happening of events etc.
- e. As regards the books, papers, forms, reports and returns filed by the Company under the above mentioned regulations, the adherence and compliance to the requirements of the said regulations is the responsibility of management. Our examination was limited to checking the execution and timeliness of the filing of various forms, reports, returns and documents that need to be filed by the Company under the said regulations. We have not verified the correctness and coverage of the contents of such forms, reports, returns and documents.

Place: New Delhi
Date: 26th May,2021



For KKS & ASSOCIATES
Company Secretaries


Krishna Kumar Singh
Proprietor
M. No 8493