

SECRETARIAL COMPLIANCE REPORT

for the year ended 31st December 2020

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** ("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 31st December 2020 ("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;
- (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 review period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not applicable during review period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable during review period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (Not applicable during review period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- (j) and circulars/ guidelines issued thereunder;

and based on the above examination, We hereby report that, during the Review Period:

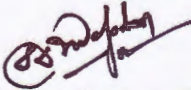
- (a) Subject to observations listed below the listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matter specified below:

Sr. No	Compliance Requirement (Regulations/Circular/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1	Regulation 20 of LODR - Chairman of Stakeholders Committee to be present at the Annual General Meeting held on 18 th July 2020	Chairman of Stakeholders Committee was not present at the Annual General Meeting held on 18 th July 2020	As informed Chairman couldn't travel due to restrictions of lockdown during Covid 19 pandemic.

Sr. No	Compliance Requirement(Regulations/Circular/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
2.	Regulation 6(1) of the LODR - listed entity to appoint a qualified Company Secretary as the compliance officer	CS Shrikant Prakash Joshi resigned from the post of Company Secretary and Compliance Officer with effect from 22 nd November 2020. Board of Directors designated Mr. Jitendra Parmar, Chief Financial Officer of the company as the Compliance officer with effect from 23 rd November 2020.	As informed the company is in process of appointment of Company Secretary as Compliance officer in the ensuing Board Meeting after 22 nd November 2020.

- (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 our examination of those records.
- (c) There are 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

For Shailesh Indapurkar & Associates
Company Secretaries


CS Shailesh Indapurkar
Proprietor
ACS 17306
C. P. No: 5701
Place: Pune
Date: 18/02/2021
UDIN:A017306B003041305

