



20th May 2025

<p>Listing Department National Stock Exchange of India Limited Exchange Plaza, 5th Floor, Plot No. C/1, G-Block Bandra Kurla Complex, Bandra (East), Mumbai - 400051</p> <p>Symbol: CENTENKA</p>	<p>Corporate Relationship Department BSE Limited 25th Floor, Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400001</p> <p>Scrip Code: 500280</p>
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Dear Sir/ Madam,

Ref: **Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations')**

Sub: **Annual Secretarial Compliance Report for the financial year ended 31st March 2025**

Pursuant to Regulation 24A of Listing Regulations, please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended 31st March 2025 issued by Mr. Sanjay H. Sangani (Proprietor of Sanjay Sangani & Co.), Practicing Company Secretaries.

The above is also available on the Company's website i.e., www.centuryenka.com.

Kindly take the same on records.

Thanking you,

Yours faithfully,
For **Century Enka Limited**

Rahul Dubey
VP Legal and Company Secretary
Membership No: FCS 8145

SANJAY SANGANI & CO.

COMPANY SECRETARIES

Sanjay H. Sangani

B.Com., F.C.S., A.C.A.

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SECRETARIAL COMPLIANCE REPORT OF CENTURY ENKA LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2025

We, Sanjay Sangani & Co., Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Century Enka Limited ("the listed entity") having its Registered Office at Plot No. 72 & 72-A MIDC, Bhosari, Pune- 411026,
- (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 Report,

for the financial year ended 31st March, 2025 ("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 {"SEBI LODR Regulations, 2015"};
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the listed entity 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 (Buy-back of Securities) Regulations, 2018; **(Not Applicable to the listed entity during the Review Period);**



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(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable to the listed entity during the Review Period);**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the listed entity during the Review Period);**

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

(h) Securities and Exchange Board of India (Depositories and Participants) 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/ circulars / guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Intimation of Change in directors is required to be submitted to the Stock Exchanges within 12 hours of the change	Regulation 30 & Schedule III of SEBI LODR Regulations, 2025 & Master Circular dated 11 th July, 2023 for compliance of provisions of SEBI LODR Regulations, 2015.	The intimation of retirement of Mr. S. K. Jain w.e.f. 1 st April, 2024 upon completion of 2 terms of 5 consecutive years each, was submitted to the Stock Exchanges on 26 th April, 2024	NSE sent email dated 26 th April, 2024 and BSE sent email dated 2 nd May, 2024 asking for reason for delay in submission of the said intimation	Clarification	The intimation of retirement of Mr. S. K. Jain w.e.f. 1 st April, 2024 upon completion of 2 terms of 5 consecutive years each, was submitted to the Stock Exchanges on 26 th April, 2024	Nil	The Company responded to NSE and BSE emails clarifying that when Mr. S. K. Jain was appointed for a second term of five consecutive years, the start date and end date of his term was already intimated to the Stock Exchanges. Thus, his term was pre-determined and the retirement was by operation of law. Further, the intention of the	The Company responded to NSE and BSE emails on 26 th April, 2024 and 3 rd May, 2024 respectively, clarifying that when Mr. S. K. Jain was appointed for a second term of five consecutive years, the start date and end date of his term was already intimated to the Stock Exchanges. Thus, his term was pre-determined and the retirement was by	-



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								<p>law is to mandate the disclosure of information that is not otherwise publicly known. Since this information was already in public domain, the Company had made the disclosure for general information to inform the shareholders regarding the compliance of composition of the Board of Directors as per the Listing Regulations.</p> <p>operation of law. Further, the intention of the law is to mandate the disclosure of information that is not otherwise publicly known. Since this information was already in public domain, the Company had made the disclosure for general information to inform the shareholders regarding the compliance of composition of the Board of Directors as per the Listing Regulations.</p> <p>No further communication has been received from the Stock Exchanges.</p>	
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(b) The listed entity has taken the following actions to comply with the observations made in the previous reports:

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
Not Applicable						

(c) We hereby report that during the Review Period the compliance status of the listed entity with the following requirements:



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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/ Remarks by PCS*
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	In case where shorter notice of Board/ Committee Meetings were given and/ or agenda and notes on agenda were circulated less than seven days before the meetings, the provisions of Section 173 (3) of the Act were complied with.
2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity. All the policies are in conformity with SEBI Regulations and have been reviewed & timely updated, as per the regulations/ circulars/ guidelines issued by SEBI. 	Yes Yes	
3.	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none"> The listed entity is maintaining a functional website Timely dissemination of the documents/ information under a separate section on the website Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-direct to the relevant document(s)/ section of the website. 	Yes Yes Yes	
4.	<u>Disqualification of Director:</u> None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013.	Yes	
5.	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies (b) Requirement with respect to disclosure of material as well as other subsidiaries	NA NA	The listed entity does not have any subsidiary.
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining	Yes	



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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/ Remarks by PCS*
	records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival Policy prescribed under SEBI LODR Regulations, 2015.		
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/ during the financial year as prescribed in SEBI Regulations.	Yes	
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions (b) In case no prior approval is obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee.	Yes NA	
9.	<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 SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	Refer to Table in Clause (a) hereinabove.
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No actions 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.	Yes	
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u>		



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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/ Remarks by PCS*
	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 V-D of Chapter V of the SEBI Master Circular on compliance with the provisions of the LODR Regulations by listed entities, as amended from time to time.	NA	There was no resignation of the Auditor during the Review Period.
13.	<u>No additional non-compliances observed:</u> No additional non-compliance observed for any of the SEBI regulation/ circular/ guidance note etc.	Yes	

Assumptions & Limitation of Scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI LODR Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Sanjay Sangani & Co.

Company Secretaries

Peer Review Certificate No. : 1689/2022


Sanjay H. Sangani

Proprietor

M. No. : FCS 4090

C.P. No. : 3847



UDIN : F004090G000379762

Mumbai, 19th May, 2025