



Emerald Tyre Manufacturers Limited
(Formerly known as Emerald Resilient Tyre
Manufacturers Private Limited)

REGISTERED OFFICE :
Emerald House
Plot No.2, 2nd Street,
Phase - 1, Porur Garden,
Vanagaram,
Chennai - 600 095.



11th November 2025

National Stock Exchange of India Limited
Exchange Plaza, 5th Floor, Plot No. C/1, G Block,
Bandra - Kurla Complex,
Bandra (East), Mumbai - 400051.

Company Symbol – ETML (NSE Emerge)
Series – EQ

ISIN: INE0RHD01013,

Dear Sir/Madam,

Sub: Comments of the Board of Directors on Non-compliance of Regulation 6 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

This is to inform that the Company has received a notice dated 21 August 2025 from National Stock Exchange of India Limited (NSE) regarding non-compliance of the appointment of a qualified Company Secretary as the Compliance Officer under the provisions of Regulation 6(1) of the SEBI (LODR) Regulations, 2015 (“LODR Regulations”) for a period of 13 days. A fine of ₹ 13,000 has been imposed by the NSE for such non-compliance and the same has paid by the Company on 21 August 2025.

In order to comply with the statutory provisions, upon the recommendation of the Nomination and Remuneration Committee, the Board of Directors in its meeting held on 2 May 2025 approved the appointment of H Narayanarao (ACS 47309) as Company Secretary and Compliance Officer of the Company.

The above notice was taken up by the Board of Directors in its meeting held on 10 November 2025 for their comments. Accordingly, the Board of Directors have taken note of the non-compliance and provide the following comments:

1. The position of Company Secretary and Compliance Officer became vacant on 19 January 2025. In accordance with Regulation 6 of the LODR Regulations, the Company was required to fill the vacancy within three months.
2. Despite sincere efforts to identify and appoint a suitable candidate within the stipulated period, the process took longer than anticipated due to practical difficulties in finding the right candidate and their notice-period constraints.

CIN: L25111TN2002PLC048665

Factory: Plot No. 79 & 80, EPIP Zone, Sipcot Industrial Complex, Gummidipoondi, Thiruvallur District,
Tamilnadu 601 201, India Tel: +91 44 6790 5505 E-Mail: accounts@emeraldtyres.com website:
www.emeraldtyres.Com



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3. The Company issued an offer letter on 8 February 2025 to a qualified person for the Compliance Officer role, and the appointment was effective 2 May 2025. The delay was purely on account of operational and practical challenges in the hiring process, and there was no mala fide intention.
4. During the interim period of vacancy, compliance functions were overseen by the senior management of the Company to ensure that compliance obligations were monitored and adhered to.

This is for your kind information and take on record.

Thanking You,

Yours faithfully,
for **Emerald Tyre Manufacturers Limited**,

V. T. Chandhrasekharan
Chairman & Managing Director

CIN: L25111TN2002PLC048665

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NSE/LIST-SOP/COMB/FINES/0915**August 21, 2025**

To,
The Company Secretary
Emerald Tyre Manufacturers Limited
Emerald House Plot No.2,
Second Street Porur Gar,
Tiruvallur Poonamallee, Tamil Nadu - 600095

Dear Sir/Madam,

Subject: Notice for non-compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) and/or Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018 (“Depository Regulations”)

Your attention is drawn towards SEBI Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 (hereinafter referred to as “Master Circular”), specifying Standard Operating Procedure for imposing fines and suspension of trading in case of non-compliance with the Listing Regulations and/or Depository Regulations. On verification of the Exchange records, it has been observed that your Company has not complied/delayed complied with certain regulations of Listing Regulation(s) and/or Depository Regulations for the quarter ended June 30, 2025. The details of non-compliance(s)/delayed compliance(s), total fine payable by your Company and the particulars about manner in which fine should be remitted to the Exchange is enclosed as **Annexure**.

You are requested to inform the Promoters about identified non-compliance/delayed compliance and to ensure compliance with respective regulation(s) and/or make the payment of fines within 15 days from the date of this notice, failing which the Exchange may initiate following actions as per Master Circular:

1. Initiate freezing of entire shareholding of the Promoters in the Company as well as in other securities held in the Demat account of the Promoters.
2. Trading in securities of your Company shall take place on 'Trade for Trade' basis, in case of consecutive defaults with Regulation 76 of Depository Regulations i.e., Shifting of trading in securities to Z Category as per Master Circular.

You may also file the waiver request. Below are the parameters for filing the application for waiver:

- a) Detailed submission indicating reasons for waiver, considering the extant Policy for Exemption of Fines, and shall indicate whether it intends to seek personal hearing before the concerned Committee.
- b) The Company may further note that ***compliance is a prerequisite for applying for waiver***. Thus, waiver application of the non-complied Companies will not be processed without achieving the compliance.
- c) In case the Company is non-complaint under multiple regulations, the Company is advised to file a single application mentioning the details of all the respective regulations and quarters for which the Company intends to apply for waiver, in order to avoid the duplication of the entries.

National Stock Exchange Of India Limited

- d) Processing fees for an amount of **Rs.10,000 plus 18% GST** to be paid to the **designated Exchange**, (as segregated between the Exchanges as per the policy for waiver of fines) only if the fine amount is more than Rs. 5,000.

However, before filing an application for waiver of fines, you are requested to refer to the below policies available on the Exchange's website. For ready reference you may refer below links:

- i. **Policy on exemption of fine:**
https://archives.nseindia.com/content/equities/Policy_for_exemption_SOP_Equity.pdf
- ii. **Policy on processing of waiver application:**
https://nsearchives.nseindia.com/web/sites/default/files/inline-files/Policy_on_processing_of_waiver_application_segregation_of_commonly_listed_entities.pdf

The request for waiver of fine can be submitted to Exchange through NEAPS portal along with documentary evidence on the below link (Please note that waiver applications sent via mail will not be considered):

NEAPS>>Compliance>>Fine Waiver>>Waiver Request

Further, as per Master Circular, your Company is also required to ensure that the said non-compliance which has been identified by the Exchange and subsequent action taken by the Exchange in this regard shall be placed before the Board in the next Board Meeting and comments made by the Board shall be duly informed to the Exchange at the below mentioned path in NEAPS portal along with this letter for dissemination having the announcement text as 'Board comments on fine levied by the Exchange'.

Path: NEAPS > COMPLIANCE > Announcements > Announcements/ CA (Subject: Updates)

In case of any clarification, you may contact any of the below mentioned Exchange Officers from Listing Compliance Department:

- Ms. Harshita Chaubal
- Ms. Sonam Yadav
- Ms. Madhu Kadam
- Ms. Chanchal Daga (Waiver request)
- Ms. Sweetie Mamodia (Waiver request)
- Mr. Vinod Nimbalkar (Waiver request)

Yours faithfully

For **National Stock Exchange of India Limited**

Rachna Jha
Manager

This Document is Digitally Signed



Signer: RACHNA JHA
Date: Thu, Aug 21, 2025 19:06:45 IST
Location: NSE

Annexure

Regulation	Quarter	Fine amount per day (Rs.)	Days of non-compliance	Fine amount (Rs.)
6	30-Jun-2025	1000	13	13000
Total Fine				13000
(GST @18%)				2340
Total				15340*

* In case the Company is non-compliant as on the date of this letter then fine amount will keep on increasing every day till the date of compliance.

Notes:

- If the fine amount is paid before receipt of this letter then inform the Exchange accordingly.
- Please update the payment details on below mentioned path:
NEAPS > Payment > SOP Fine Payment.
- The above payment may be made vide RTGS / NEFT / Net Banking favouring 'National Stock Exchange of India Limited'. The bank details towards the payment of fine are as follows:

BENEFICIARY NAME	NATIONAL STOCK EXCHANGE OF INDIA LIMITED
BANK NAME	IDBI BANK LTD
A/C NO	Please refer Unique Account Code used for making Annual Listing fees to the Exchange
BRANCH	BANDRA KURLA COMPLEX, MUMBAI
RTGS/IFSC CODE	IBKL0001000

- The fine paid as mentioned above will be credited to IPFT as envisaged in the circular.

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