

Mandar Vasmatkar

Company Secretary & Chief-Compliance <u>mandar.vasmatkar@timken.com</u>

12 June, 2024

National Stock Exchange of India Ltd.	BSE Limited
Exchange Plaza,	Phiroze Jeejeebhoy Towers,
Plot no. C/1, G Block,	Dalal Street,
Bandra Kurla Complex, Bandra (East)	Mumbai – 400 001.
Mumbai – 400 051.	
NSE Symbol: TIMKEN	<u>Scrip Code: 522113</u>

Dear Sir/Madam,

Sub: Order from Regional Provident Fund Commissioner - I

Pursuant to Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, details regarding Order received by the Company under Section 7Q of the Employees Provident Funds and Miscellaneous Provisions Act, 1952 (EPF Act), are as under:

Particulars	Details
Name of the Authority	Regional Provident Fund Commissioner - I
	Jamshedpur ('RPFC'), Employees Provident
	Fund Organization ('EPFO')
Date of receipt of Order	11 June, 2024
Details of the violation(s)/contravention(s)	The Company had obtained an exemption
committed or alleged to be committed and	under Section 17(1)(a) of the EPF Act, from
actions so far	the Ministry of Labour and Employment
	("Exemption"), pursuant to which it was
	operating the Trust to provide provident
	fund benefits for its employees. The
	Company and the Trust voluntarily made an
	application to RPFC to surrender the
	Exemption with effect from 1 April, 2018.
	The Trust remitted accumulated funds to
	accounts of Employees Provident Fund
	Organization (EPFO') in three tranches in
	March, May and July 2022.
	According to RPFC, Company/Trust had to

transfer accumulated funds (liquid cash within 10 days and securities within 30 days) from 1 April, 2018 and it has remitted funds in the year March/ May/ July 2022 and therefore, RPFC had calculated interest under Section 7Q of EPF Act amounting to Rs. 55,89,48,173/- and asked the Company to submit its representation stating why these amounts should not be recovered from the Company.

The Company had submitted a written representation inter-alia stating that according to Section 17(5) of the EPF Act read along with the Employees' Provident Funds Scheme, 1952, due date for transfer of accumulated funds (liquid cash within 10 days and securities within 30 days) starts from date of cancellation of Exemption. Till date, the Company has not yet received an order for cancellation of Exemption. The Company was consistently displayed on **EPFO** Portal 'Exempted Establishment' until October 2022, and the Company was submitting monthly returns as an Exempted Establishment till such time. Only in November 2022, the status of the Company on the EPFO portal was changed to 'Un-exempted Establishment' without notice to the Company.

Nonetheless, since accumulated funds were transferred before cancellation of Exemption, there can be no claim, ground or assertion that there was any delay in the transfer of accumulated funds and hence imposing damages, interest is not tenable.

Further, without conceding any liability, the Company provided revised calculation for computation of interest under Section 7Q of EPF Act.



Nature and details of action(s) taken, initiated	RPFC took note of submissions made by the
or order(s) passed	Company and thereafter, through its Order
	dated 11 June, 2024 read along with its letter
	dated 11 June, 2024 directed the Company to
	deposit Rs. 8,90,17,593/- as net amount
	payable towards interest under Section 7Q of
	EPF Act.
Impact on financial, operation or other	Nil.
activities of the Company, quantifiable in monetary terms to the extent possible	It may please be noted that the Company had intimated to the stock exchanges on this subject matter on voluntary basis on 9 May, 2024. The Company then had only received show cause notice and now, Order has been passed. RPFC earlier had claimed Rs. 55,89,48,173/- as interest which has now come to down to Rs. 8,90,17,593/
	The Company has also given an update about RPFC's Order on damages on this subject matter on 11 June, 2024. The Company is taking necessary steps to
	challenge this Order before appropriate Authority.

You are kindly requested to take note of the above.

Yours faithfully,

For TIMKEN INDIA LIMITED

MANDAR Digitally signed by MANDAR MOHANIRAJ VASMATKAR Date: 2024.06.12 16:58:02 +05'30'

Mandar Vasmatkar Company Secretary & Chief - Compliance

