



ALLIANCE INTEGRATED METALIKS LIMITED

Regd. Office : 5th Floor, Unit No 506, Building No 57, Manjusha Building,
Nehru Place, New Delhi - 110019
Tel.: +91-11-40517610, **E-mail :** alliance.intgd@rediffmail.com **Web :** www.aiml.in
CIN : L65993DL1989PLC035409

Ref. No.: AIML/BSE/2021-22

Date: 29th June, 2021

To

The Manager
Listing Department
BSE Limited,
Phiroze Jee Jee Bhoj Towers,
Dalal Street, Mumbai – 400001

Scrip code: 534064

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

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended by SEBI (Listing Obligations and Disclosure Requirements)(Second Amendment) Regulations, 2021 dated 5th May 2021, read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 8th February 2019, Please find enclosed herewith the Annual Secretarial Compliance Report issued by Mr. Sachin Khurana, Proprietor of M/s S. Khurana & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2021.

This is for your information and records.

Thanking you,

For **ALLIANCE INTEGRATED METALIKS LIMITED**

Daljit Singh Chahal
Wholetime Director

Encl :a/a

S. Khurana & Associates

Company Secretaries

Secretarial Compliance Report of **ALLIANCE INTEGRATED METALIKS LIMITED** for the financial year ended March 31, 2021

Company Name : Alliance Integrated Metaliks Limited
CIN : L65993DL1989PLC035409
Registered Office Address : 5th Floor, Unit No. 506, Building No. 57, Manjusha Building
Nehru Place, New Delhi - 110019
Listed on : BSE Limited (“BSE”)

I Sachin Khurana, Practicing Company Secretary have examined:

- The documents and records made available to us and explanation provided by **ALLIANCE INTEGRATED METALIKS LIMITED** (“the listed entity”),
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **March 31, 2021** (“Review Period”) in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable as the Company has not issued any security during the financial year under review.**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable as the Company has not bought back any of its securities during the financial year under review.**

Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable as the Company has not granted any options to its employees during the financial year under review**



- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable as the Company has not issued / listed any Debt Security**
- g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

I 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/guideline including specific clause)	Deviations	Remarks / Observations of the Practicing Company Secretary
1.	Regulation 40(10) – Simultaneous Intimation to Stock Exchange(s)	Delayed Submission	Certificate obtained under Regulation 40(9) was required to be submitted to Stock Exchange(s) simultaneously. Certificate was obtained on May 26, 2020 and was submitted to Stock Exchange on May 29, 2020
2.	Regulation 30 – Disclosure of events	Delay Submission	Outcome of the 3 rd Board Meeting was intimation to Stock Exchange(s) with a delay of five (5) minutes.
3.	Regulation 47(3) – Newspaper publication and intimation to Stock Exchange(s)	Delay Submission	Financial Statements for the Quarter ended June 30, 2020 were approved on November 11, 2020, newspaper publication was made on November 12, 2020 and intimation to Stock Exchange(s) was made on November 18, 2020.
4.	Regulation 33(3)(a) – Financial Results	Delay Submission	Financial Results for the Quarter and year ended March 31, 2020 was submitted to Stock Exchange(s) on September 23, 2020, extension was provided upto July 31, 2020.
5.	Regulation 33(3)(a) – Financial Results	Delay Submission	Financial Results for the Quarter ended June 30, 2020 was submitted to Stock Exchange(s) on November 11, 2020, extension was provided upto September 15, 2020.
6.	Regulation 33(3)(a) – Financial Results	Delay Submission	Financial Results for the Quarter and Half Year ended September 30, 2020 was submitted to Stock Exchange(s) on February 26, 2021, due date was upto November 14, 2020.



7.	Regulation 33(3)(a) – Financial Results	Delay Submission	Financial Results for the Quarter and Nine Months ended December 31, 2020 was submitted to Stock Exchange(s) on April 13, 2021, due date was upto February 14, 2021.
8.	Regulation 18(1) – Compliance with respect to constitution of Audit Committee	Non- Compliance	Fine of Rs. 2,14,760/- was imposed by BSE computed till quarter ended June 30, 2020

(b) The listed entity has generally maintained records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.

(c) The following are the details of 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:

Sr. No.	Action taken by	Details of violation	Details of action taken e.g., fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	Stock Exchange	Non compliance with Regulation 18(1) with respect to constitution of Audit Committee	Fine Rs. 2,14,760/- was imposed by Stock Exchange computed till June 30, 2020	The said fine was paid by the company on October 9, 2020
2	Stock Exchange	Late submission of financial results for the quarter and year ended March 31, 2020	Fine of Rs. 3,06,800/- was imposed for delayed filing of 52 days	The said fine was paid by the company on October 9, 2020 and November 13, 2020
3	Stock Exchange	Late submission of financial results for the quarter ended June 30, 2020	Fine of Rs. 3,36,300/- was imposed for delayed filing of 57 days	The said fine was paid by the company on November 13, 2020 and December 02, 2020



4	Stock Exchange	Late submission of financial results for the quarter and half year ended September 30, 2020	Fine of Rs. 5,95,900/- was imposed for delayed filing of 101 days	The said fine was paid by the company on March 5, 2021
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*Company is under Graded Surveillance Measures (GSM) Stage IV

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observation of Practicing Company Secretary in previous report(s)	Observation made in the Secretarial Compliance Report for the year ended March 31, 2020	Actions taken by the listed entity	Remarks of the Practicing Company Secretary
1.	Regulation 33(3)(a)- Financial Result for Quarter and Year ended 31 st March, 2019	Delayed Submission	Fine by BSE of Rs. 88,500/- (Including 18% GST @Rs. 5,000/- per day	The audited financial results were submitted on June 14, 2019 with a delay of 15 (Fifteen) days and Company has paid the fine of Rs. 88,500/-.
2.	Regulation 23(9)- Related Party Disclosure for Year ended 31 st March, 2019	Delayed Submission	No Notice was issued by BSE	Related Party Disclosure for Year ended 31 st March, 2019 was filed on 12 th September 2019.
3.	Regulation 33(3)(a) - Financial Result for Quarter ended 30 th September, 2019	Delayed Submission	Fine by BSE of Rs. 88,500/- (Including 18% GST @Rs. 5,000/- per day	The unaudited financial results were submitted on November 29, 2019 with a delay of 15 (Fifteen) days and Company has paid the fine of Rs. 88,500/-.
4.	Regulation 14- Fees and Other Charges to be paid to the Stock Exchange for the financial year 2019-20	Annual Listing Fees has been paid after the expiry of due date.	Annual Listing Fee bill of Rs. 3,54,000/- was issued by BSE	The Annual Listing Fees (ALF) for the financial year 2019-20 has been paid on 28 th May 2019.



5.	Pursuant to SEBI Circular SEBI/HO/DDHS/CIR/P/2018/144 dated 26th November, 2018 - Large Entity Disclosure	Delayed Submission	Reminder Mail by BSE	Large Entity disclosure was submitted on 3rd August 2019
6.	Regulation 34 - Annual Report for the F.Y. 2018-19	Delayed submission	Penalty notice was issued but later waived off by BSE	Annual Report for the F.Y. 2018-19 has been submitted on 21st September 2019.
7.	Regulation 6 - Non - appointment of Company Secretary Quarter Ended March 2019	Default in complying with Regulation 6	Penalty of Rs. 1,06,200/- was imposed by BSE	Company Secretary was appointed on June 3, 2019 and Penalty was paid on May 28, 2019

For S. Khurana & Associates
Company Secretaries
FRN – I2014DE1158200
Peer Review No.: 804/2020



Sachin Khurana
Proprietor

M. No.: F10098; CP No.:13212
UDIN: F010098C000530673



Date: 28/06/2021
Place: New Delhi