



ALLIANCE INTEGRATED METALIKS LIMITED

Regd. Office: DSC-327, Second Floor, DLF South Court, Saket, New Delhi-110017
Tel: +91-11-40517610, E-mail : alliance.intgd@rediffmail.com Web : www.aiml.in
CIN : L65993DL1989PLC035409

Ref. No.: AIML/BSE/2023-24

Date: May 30, 2023

To,

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

Scrip code: 534064

Sub: Annual Secretarial Compliance Report for the financial year ended 31st March, 2023

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, 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, 2023.

This is for your information and records.

Thanking you,

For **ALLIANCE INTEGRATED METALIKS LIMITED**

Malti Devi
Company Secretary

Enclosed : As stated

S. Khurana & Associates

Company Secretaries

SECRETARIAL COMPLIANCE REPORT

FOR THE FINANCIAL YEAR ENDED ON MARCH 31, 2023
[Report pursuant to Regulation 24A of the Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
The Board of Directors
Alliance Integrated Metaliks Limited
CIN: L65993DL1989PLC035409
DSC-327, Second Floor, DLF South Court,
Saket, new Delhi - 110017

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **ALLIANCE INTEGRATED METALIKS LIMITED, CIN - L65993DL1989PLC035409** (hereinafter referred as 'the listed entity'), having its Registered Office at DSC 327, Second Floor, DLF South Court, Saket, New Delhi - 110017. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2023, generally complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I, Sachin Khurana, Practicing Company Secretary have examined:

- All 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, 2023** ("Review Period") in respect of compliance with the provisions of:

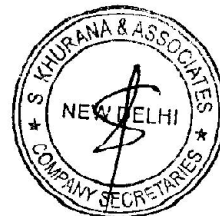
- The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");



The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 as the listed entity has not issued any further share capital 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 as the listed entity has not bought back/propose to buy-back any of its securities during the Review Period**];
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 [**Not applicable as the Company has not offered any shares or granted any options pursuant to any employee benefit scheme during the Review Period**];
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 [**Not applicable as the listed entity has not issued any Non-Convertible Securities during the Review Period**];
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and
- h) Regulations and Bye-laws framed under the Depositories Act, 1996 to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018,

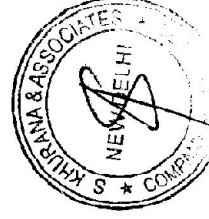
and circulars/ guidelines issued thereunder;



and based on the above examination, I report that during the review period:

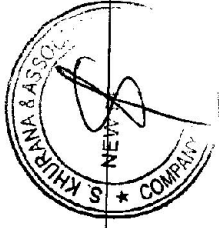
(I) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued there under, except in respect of matters specified below: -

Sr. No	Compliance Requirement (Regulations/ Circulars/ guideline including specific clause)	Regulation /Circular Number	Deviations	Action taken by	Type of Action	Details of Violation/Clarification/ Advisory/Fine/Show Cause Notice/Warning	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response to Violation/Clarification/ Advisory/Fine/Show Cause Notice/Warning	Remarks
1	Submission of Corporate Governance Report to Stock Exchange	Reg. 27(2)	Delay in filing	BSE	Fine	Delay in submission by 9 days for the quarter ended September 2022	Rs. 14000/-	BSE levied fine vide email dated November 23, 2022.	The Company has requested to the exchange for waiver of the delayed compliance, as the Delay was due to the technical error	-
2	Disclosure in a related party transaction on a consolidated basis	Reg. 23(9)	Delay in filing	No action has been taken	No action has been taken	Disclosure in PDF was filed on June 13, 2022. However, the XBRL filing was completed on August 31, 2022	NA	Company has filed XBRL filing of related party transaction with a delay of 3 months	Due to technical error, the company was not able to file the same. However, Company has submitted the Disclosure in pdf mode within due date.	-

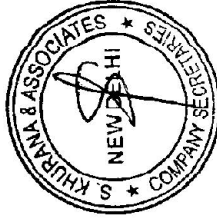


(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/ Circulars/ guideline including specific clause)	Regulation/ Circular Number	Deviations	Action taken by	Type of Action	Details of Violation/ Clarification/ Advisory/Fine/ Show Cause Notice/Warning	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response to Violation/ Clarification/ Advisory/Fine/ Show Cause Notice/Warning	Remarks
1	Reporting of Financial Results for quarter ended March 31, 2021	Reg. - 33	Delay of 14 days	BSE	Fine	Delayed Submission	Rs 82,600/-	A fine waiver request was made by the listed entity to BSE.	BSE vide its email dated 23 February, 2022 confirmed the waiver of the said fine and advised to exercise caution and stricter compliance of Regulations	-
2	Intimation of Board Meeting details to BSE	Reg. 29(2)/29(3)	Delay of 3 days	BSE	Fine	Delay in intimation	Rs 11,800/-	A fine waiver request was made by the listed entity to BSE.	The company has paid the fine.	-
3	Outcome of Board Meeting	Reg. 30	Delay of 26 Minutes	BSE	No action initiated by BSE	Delay in intimation of outcome of Board Meeting held on July 14, 2021 to BSE	NIL	Listed entity has not received any notice/advisory/clarification letter/Show Cause from BSE	No email received for the same from stock exchange.	-
4	Outcome of Board Meeting	Reg. 30	Delay of 19 Minutes	BSE	No action initiated by BSE	Delay in intimation of outcome of Board Meeting held on August 11, 2021	NIL	Listed entity has not received any notice/advisory/clarification letter/Show Cause from BSE	No email received for the same from stock exchange.	-



5	Outcome of Board Meeting	Reg. 30	Delay of 36 Minutes	BSE	No action initiated by BSE	Delay in intimation of outcome of Board Meeting held on November 13, 2021.	NIL	Listed entity has not received any notice/advisory/clarification letter/Show Cause from BSE	No email received for the same from stock exchange.	-
6	Outcome of Board Meeting	Reg. 30	Delay of 24 Minutes	BSE	No action initiated by BSE	Delay in intimation of outcome of Board Meeting held on February 14, 2022.	NIL	Listed entity has not received any notice/advisory/clarification letter/Show Cause from BSE	No email received for the same from stock exchange	-

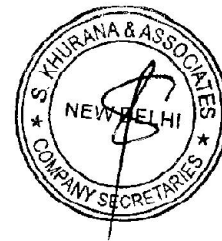


(II.) Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

S. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year</p>	<p>No</p> <p>NA</p> <p>NA</p>	<p>The Auditor has not resigned from the listed entity during the reporting period</p>
2.	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>A. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>B. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p>	<p>NA</p> <p>NA</p>	<p>Auditor has not resigned from the listed entity during the reporting period</p> <p>The Auditor has not resigned from the listed entity during the reporting period</p>

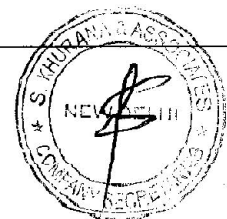


	<p>C. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>	<p>NA</p> <p>NA</p>	<p>Auditor has not raised any concern about non-receipt of information</p> <p>Auditor has not raised any concern about non-receipt of information</p>
<p>3.</p>	<p>The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.</p>	<p>NA</p>	<p>The Auditor has not resigned from the listed entity during the reporting period</p>

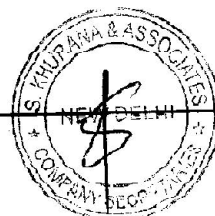


(III.) I, hereby report that, during the review period the compliance status of the listed entity is appended as below:

S. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/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 India (ICSI)	Yes	-
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 entities. • All the policies are in conformity with SEBI Regulations and has 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-directs to the relevant document(s)/section of the website. 	Yes Yes Yes	The listed entity is maintaining a functional website and as confirmed by the management, information under separate section was disseminated within time.
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	-
5.	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes Yes	- -



6.	<p><u>Preservation of Documents:</u></p> <p>The listed entity is preserving and maintaining 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.</p>	Yes	-
7.	<p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.</p>	Yes	-
8.	<p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions.</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee</p>	Yes NA	Company has obtained prior approval; hence this point is not applicable.
9.	<p><u>Disclosure of events or information:</u></p> <p>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.</p>	Yes	-
10.	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	Yes	The listed entity has implemented software-based tracking w.e.f September 21 2022. Earlier to this date, compliance was done through protected excel sheet.
11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>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.</p>	Yes	No action has been taken by the SEBI. However, Action taken by Stock Exchange(s) is provided in detail in table (a) of this report

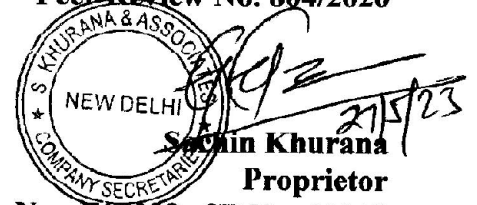


12.	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	No	Details of all non-compliances is reported in table (a) of this report
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Assumptions & Limitation of scope 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. My responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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 (Listing Obligations and Disclosure Requirements) 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 S. Khurana & Associates
Company Secretaries
FRN: I2014DE1158200
Peer Review No. 804/2020**



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

Date: May 27, 2023

Place: New Delhi

UDIN: 0F10098E000401104