



# 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, Website : www.aiml.in  
CIN : L65993DL1989PLC035409

**Ref. No.: AIML/BSE/16/2024-25**

**Date: May 30, 2024**

**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 31<sup>st</sup> March, 2024**

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, 2024.

This is for your information and records.

Thanking you,

For **ALLIANCE INTEGRATED METALIKS LIMITED**

**Malti Devi**  
**Company Secretary & Compliance Officer**

**Enclosed : As stated**

# S. Khurana & Associates

## Company Secretaries

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### SECRETARIAL COMPLIANCE REPORT OF FOR THE FINANCIAL YEAR ENDED MARCH 31, 2024

To,  
**The Board of Directors**  
**Alliance Integrated Metaliks Limited**  
**CIN: L65993DL1989PLC035409**  
**DSC-327, Second Floor, DLF South Court,**  
**Saket, 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, 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, 2024**, 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:

- a) All the documents and records made available to us and explanation provided by **Alliance Integrated Metaliks Limited** ("the listed entity"),
- 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 certification,

For the year ended **March 31, 2024** ("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 there under; and
- b) 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");

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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;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) 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.**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **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 Non-Convertible Securities) Regulations, 2021; **Not Applicable as the Company has not listed any Non-Convertible Securities.**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder 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:

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(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	Deviation	Action taken by	Type of Action	Details of Violation/ Clarification/ Advisory/Fine /Show Cause Notice/ Warning	Fine (INR)	Observations/ Remarks of the Practicing Company Secretary	Management Response to Violation/ Clarification/ Advisory/Fine/ Show Cause Notice/Warning	Remarks
1	Default on payment of interest/ repayment of principal amount on loan from banks/ FI	<b>SEBI/HO/C FD/CMD1/ CIR/P/201 9/140</b>	Report to Stock exchange within 7 days from end of quarter	NIL	NA	Delay in submission for the quarter ended March 2023 by 39 days	NA	No action has been taken	The delay was due to the reconciliation issue with the Banks.	-
2	Default on payment of interest/ repayment of principal amount on loan from banks/ FI	<b>SEBI/HO/C FD/CMD1/ CIR/P/201 9/140</b>	Report to Stock exchange within 7 days from end of quarter	NIL	NA	Delay in submission for the quarter ended June 2023 by 13 days	NA	No action has been taken	The delay was due to the reconciliation issue with the Banks.	-

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

<b>Sr. No</b>	<b>Compliance Requirement (Regulations/ Circulars/ guideline including specific clause)</b>	<b>Regulation / Circular Number</b>	<b>Deviation</b>	<b>Action taken by</b>	<b>Type of Action</b>	<b>Details of Violation/Clarification/ Advisory/Fine/ Show Cause Notice/Warning</b>	<b>Fine (INR)</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>	<b>Management Response to Violation/ Clarification/ Advisory/Fine/ Show Cause Notice/Warning</b>	<b>Remarks</b>
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	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 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.	-

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

<b>S. No.</b>	<b>Particulars</b>	<b>Compliance Status (Yes/No/NA)</b>	<b>Observations/Remarks by PCS</b>
1.	<p><b><u>Secretarial Standards:</u></b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p>	<b>Yes</b>	The Company has generally complied with the Secretarial Standards 1 and 2.
2.	<p><b><u>Adoption and timely updation of the Policies:</u></b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li> <li>• All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>	<b>Yes</b>  <b>Yes</b>	-  -
3.	<p><b><u>Maintenance and disclosures on Website:</u></b></p> <ul style="list-style-type: none"> <li>• The listed entity is maintaining a functional website.</li> <li>• Timely dissemination of the documents/ information under a separate section on the website.</li> <li>• 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.</li> </ul>	<b>Yes</b>  <b>Yes</b>  <b>Yes</b>	The listed entity is maintaining a functional website and as confirmed by the management, information under separate section was disseminated within time.

4.	<b><u>Disqualification of Director:</u></b> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	<b>Yes</b>	-
5.	<b><u>To examine details related to Subsidiaries of listed entities:</u></b>  (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	<b>Yes</b>  <b>Yes</b>	-  -
6.	<b><u>Preservation of Documents:</u></b>  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.	<b>Yes</b>	-
7.	<b><u>Performance Evaluation:</u></b>  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.	<b>Yes</b>	-
8.	<b><u>Related Party Transactions:</u></b>  (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions.	<b>Yes</b>	-

	(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	<b>NA</b>	Company has obtained prior approval; hence this point is not applicable.
9.	<b><u>Disclosure of events or information:</u></b>  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.	<b>Yes</b>	-
10.	<b><u>Prohibition of Insider Trading:</u></b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	<b>Yes</b>	
11.	<b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b>  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.	<b>No</b>	No action has been taken by the SEBI against the listed entity. However, Action taken by Stock Exchange(s) is provided in detail in table (a) of this report.



12.	<p><b>Resignation of statutory auditors from the listed entity or its material subsidiaries</b></p> <p>The listed entity has complied with paragraph 6.1 and 6.2 of Section V-D of chapter V of “Master Circular on compliance with the provisions of SEBI LODR Regulations, 2015 by listed entities” and that they have incorporated all the terms and conditions in the engagement letter issued to the auditors of the Company</p>	<p><b>NA</b></p>	<p>The listed entity does not have any material subsidiary and no resignation of statutory auditors took place during the period under review.</p>
13.	<p><b><u>Additional non-compliances, if any:</u></b></p> <p>No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.</p>	<p><b>No</b></p>	<p>Details of all non-compliances is reported in table (a) of this report</p>

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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**

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**Sachin Khurana  
Proprietor**

**M. No.: F10098; CP No.:13212  
UDIN - F010098F000485023  
Date: May 29, 2024 | Place: New Delhi**