



## PRECISION WIRES INDIA LIMITED

**REGD. OFFICE:** SAIMAN HOUSE, J. A. RAUL STREET,  
OFF SAYANI ROAD, PRABHADEVI, MUMBAI - 400 025, INDIA.  
TEL: +91-22-24376281 FAX: +91-22-24370687

E-MAIL: mumbai@pwil.net

WEB: www.precisionwires.com

**CIN: L31300MH1989PLC054356**

**WORKS:** PLOT NO. 125/2, AMLI HANUMAN (66 KVA) ROAD,  
SILVASSA - 396 230, U.T OF D.N.H., INDIA.

TEL: +91-260-2642614

FAX: +91-260-264235

**Date: 26<sup>th</sup> June, 2021**

<b>BSE Limited (BSE)</b> Corporate Relationship Department, 1 <sup>st</sup> Floor, New Trading Ring, Rotunda Building, P.J.Towers, Dalal Street, Fort, Mumbai-400 001  <b>Company Code : 523539</b>	The Manager, Listing Department <b>National Stock Exchange of India Limited (NSE)</b> 'Exchange Plaza', C-1, Block G, Bandra - Kurla Complex, Bandra (E), Mumbai - 400 051. <b>Symbol : PRECWIRE</b>
---	---

**Dear Sir/Madam,**

**Subject: Annual Secretarial Compliance Report for the year ended March 31, 2020 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")**

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the annual secretarial compliance report for the year ended March 31, 2021.

You are requested to take above information in your records.

Thanking you.

**For Precision Wires India Limited**

**Deepika Pandey**  
**Company Secretary**  
**ACS No: 41277**

**Encl: As Agenda**



# *Ragini Chokshi & Co.*

Tel. : 022-2283 1120  
022-2283 1134

## *Company Secretaries*

34, Kamer Building, 5th Floor, 38 Cawasji Patel Street, Fort, Mumbai - 400 001.  
E-mail : ragini.c@rediffmail.com / mail@csraginichokshi.com  
web: csraginichokshi.com

### **SECRETARIAL COMPLIANCE REPORT OF PRECISION WIRES INDIA LIMITED FOR THE YEAR ENDED MARCH 31, 2021**

[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We have examined:

- (a) all the documents and records made available to us and explanation provided by **PRECISION WIRES INDIA 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, 2021 ("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 thereunder; and
- b. 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:-

- 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; **(Not Applicable to the Company during the Audit Period)**
- 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 to the Company during the Audit Period)**
- E. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Audit Period)**
- F. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit Period)**
- G. Securities and Exchange Board of India (Issue and Listing of Non–Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the Company during the Audit Period)**
- H. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- I. Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018 (To the extent applicable);

and based on the above examination, We 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/guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	As per Regulation 30(6) read with Schedule III Part A Para A point 12 of SEBI (Listing Obligation and Disclosure	<ul style="list-style-type: none"> <li>The newspaper advertisements on 22<sup>nd</sup> July, 2020 for transfer</li> </ul>	<ul style="list-style-type: none"> <li>The newspaper advertisements on 22<sup>nd</sup> July, 2020 for transfer of shares to IEPF was</li> </ul>

	Requirement) Regulations, 2015, issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the listed entity to be submitted to Stock Exchanges not later than 24 hours of occurrence of event or information.	of shares to IEPF was submitted to BSE with a delay of 14 days.  • The newspaper advertisements on 18 <sup>th</sup> October, 2020 for transfer of shares to IEPF was submitted to BSE & NSE with a delay of 1 day.	submitted to BSE beyond the prescribed time;  • The newspaper advertisement on 18 <sup>th</sup> October, 2020 for transfer of shares to IEPF was submitted to BSE & NSE beyond the prescribed time.
2	As per Regulation 23(9) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015, The listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis in the format specified in the relevant accounting standards for annual results to the stock exchanges.	Disclosures on related party transactions for half year ended 31 <sup>st</sup> March, 2020 was submitted to BSE with a delay of 119 days	The listed entity submitted disclosures on related party transactions for half year ended 31 <sup>st</sup> March, 2020 to BSE beyond the prescribed time. However, the same has been submitted to NSE within time limit.
3	As per Regulation 16(1)(b) read with Regulation 25(8) of SEBI (Listing Obligation and	The declarations were not placed at the first Board Meeting of the	The declarations by Independent Directors were placed at the Second Board Meeting of the

<p>Disclosure Requirement) Regulations, 2015, Every independent director shall,at the first meeting of the board in every financial year submit a declaration that he meets the criteria of independence as provided in clause (b) of sub-regulation (1) of regulation 16 and that he is not aware of any circumstance or situation, which exist or may be reasonably anticipated, that could impair or impact his ability to discharge his duties with an objective independent judgment and without any external influence.</p>	<p>Financial Year</p>	<p>Financial Year instead of First Board Meeting.</p>
---	-----------------------	---

B. The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my/our 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 actions taken E.g. fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary
Not Applicable during the year under review				

D. The listed entity has taken the following actions to comply with the observations made in previous reports:

<b>Sr.No</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
<b>1</b>	The Company has submitted the shareholding pattern for the September Quarter within prescribed time i.e. on 21/10/2019 However due to public holiday the BSE website shows that it was filed on 23/10/2019.	2020		Complied

**For RaginiChokshi& Co**

**Place: Mumbai**  
**Date: 23/06/2021**

**RaginiChokshi**  
**(Partner)**  
**Membership No:2390**  
**CP No:1436**  
**UDIN:F002390C000503836**