



**POOJAWESTERN  
METALIKS LIMITED**

We make better, Since 1991

Ph.: +91 288 2730088 / 2730099  
Mobile : +91 88666 86058  
E-mail : info@poojametal.com  
Website : www.poojametal.com

CIN : L27320GJ2016PLC094314

Plot No.1, G.I.D.C. Industrial Area, Phase II,  
Dared, Jamnagar - 361 004 (Gujarat) INDIA

**Date: May 28, 2022**

To,  
**BSE Limited**  
Corporate Relation Department  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400 001

Dear Sir/Ma'am,

**Sub: Submission of Secretarial Compliance Report for the year ended on March 31, 2022**

**Ref: Poojawestern Metaliks Ltd (Security Id.: POOJA/ Security Code: 540727)**

With reference to the Captioned Subject, please find here with enclosed Secretarial Compliance Report of the Company issued by M/s. Payal Dhamecha & Associates, Practicing Company Secretaries for the year ended on March 31, 2022.

Please take on your record and oblige us.

Thanking You,

Yours faithfully,

For, Poojawestern Metaliks Limited

**Sunil Devram Panchmatiya**  
**Chairman & Managing Director**  
**DIN: 02090742**



**Place: Jamnagar**

To,  
**The Board of Directors,**  
**Poojawestern Metaliks Limited**  
CIN: - L27320GJ2016PLC094314  
Plot No. 1, Phase II, Gidc, Dared  
Jamnagar-361004, Gujarat.

Sir/Madam,

**SECRETARIAL COMPLIANCE REPORT**

We have been engaged by **Poojawestern Metaliks Limited** (hereinafter referred to as 'the Company' bearing CIN:- **L27320GJ2016PLC094314** whose Equity Shares are Listed on BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No CIR/CFD/CMD/1/27/2019 dated 8<sup>th</sup> February, 2019 and to issue the Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and Circulars/guidelines issued thereunder from time to time and issue a report thereon.

Our Audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Secretarial Compliance Report is enclosed herewith.

**For Payal Dhamecha & Associates**  
**Company Secretaries**  
**Firm Registration Number: - S2020GJ735800**  
**Peer Review Number: - 2115/2022**





**Payal Dhamecha**  
**Proprietor**  
**M No. A47303, COP: - 20411**  
**UDIN:- A047303D000417112**  
**Date: - May 28, 2022**  
**Place: -Ahmedabad**

**248, Iscon Emporio, Nr. Jodhpur Cross Road, Satellite, Ahmedabad - 380015**  
**M: +91 - 8238328985, Email: cspayald1314@gmail.com**

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**SECRETARIAL COMPLIANCE REPORT  
OF  
POOJAWESTERN METALIKS LIMITED  
for the Financial Year ended on March 31, 2022**

**[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]**

We, have examined:

- (a) all the documents and records made available to us and explanation provided by **POOJAWESTERN METALIKS LIMITED** (“the Company” or “the listed entity” or “PWML”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity and
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on March 31, 2022 (“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;

- i. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- ii. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- iii. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- iv. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- v. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (to the extent applicable);
- vi. and circulars/ guidelines/Amendments issued thereunder,

and based on the above examination and explanation/clarification given by the Company and its officers/KMP’s,

**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 to the extent applicable and in the manner prescribed;
- (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 our examination of those records;

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- (c) No action has been 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;
- (d) The reporting of actions by the Listed Entity to comply with the observations made in previous reports does not arise during the review period.

We further report that, during the review period, following regulations issued by the Securities and Exchange Board of India were not applicable to the Company, since there were no such instances occurred during the review period that requires the compliance under the said regulations;

- a. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- b. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Upto August 12<sup>th</sup>, 2021) and The Securities and Exchange Board of India ( Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (with effect from August 13, 2021) ;
- c. Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; ( Upto June 09, 2021) and Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 ((with effect from June 10, 2021);
- d. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Upto August 08, 2021);
- e. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 ( Upto August 08, 2021);
- f. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 ( with effect from August 09, 2021);
- g. The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries".

**For Payal Dhamecha & Associates**  
**Company Secretaries**  
**Firm Registration Number: - S2020GJ735800**  
**Peer Review Number: - 2115/2022**

  


**Payal Dhamecha**  
**Proprietor**  
**M No. A47303, COP: - 20411**  
**UDIN: - A047303D000417112**  
**Date: - May 28, 2022**  
**Place: -Ahmedabad**

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