



PREMCO
GLOBAL LTD.

Date: 20/05/2024

To,
BSE Limited,
Dept. of Corporate Services,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001.

Company Security Code – 530331

Sub.: Annual Secretarial Compliance Report for the year ended 31st March, 2024.

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the relevant circular(s) issued by SEBI/Stock Exchanges from time to time, please find enclosed the Annual Secretarial Compliance Report issued by Mr. Sanjay Dholakia of M/s. Sanjay Dholakia & Associates Practicing Company Secretary, for the financial year ended 31st March, 2024.

Kindly take the same on your records.

Thanking you,

For Premco Global Limited

**ASHOK
HARJANI**

Digitally signed by
ASHOK HARJANI
Date: 2024.05.20
15:01:37 +05'30'

Ashok Bhagwandas Harjani
Managing Director
DIN:- 00725890

Encl: as above



"URMI ESTATE", Tower-A, 11th Floor, 95, Ganpatrao Kadam Marg, Lower Parel(West),
Mumbai - 400013. Tel.: +91-22-6105 5000
E-mail:admin@premcoglobal.com Web: www.premcoglobal.com,
CIN NO. L18100MH1986PLC040911



SANJAY DHOLAKIA & ASSOCIATES

BCOM LLB FCS

COMPANY SECRETARIES

GP 15, 2nd Floor, Raghuleela Mall, Behind Poincur Bus Depot, Kandivali (West), Mumbai - 400 067.
☎ : 31578826 / 49713233 / 98700 31365 • E-mail : sanjayrd65@gmail.com

ANNUAL SECRETARIAL COMPLIANCE REPORT OF PREMCO GLOBAL LIMITED FOR THE YEAR ENDED 31st MARCH, 2024

(Pursuant to Regulation 24A(2) SEBI (Listing Obligations and Disclosure Requirements),
Regulations, 2015 read with circular dated 8th February 2019 issued by SEBI)

To,

PREMCO GLOBAL LIMITED

CIN: L18100MH1986PLC040911

**Urmi Estate, Tower-A, 11th Floor, 95 Ganpatrao Kadam Marg,
Lower Parel (W), Mumbai, Maharashtra, India, 400013**

I Sanjay Dholakia, Practising Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by **PREMCO GLOBAL LIMITED** ("the listed entity");
- (b) the filings / submission 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 report.

For the financial year ended 31st March, 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 thereunder; and
- (b) The Securities Contract (Regulation) Act,1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI Act");

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 Requirement) Regulations,2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) 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 during the review period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits & Sweat Equity) Regulations, 2021;



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- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars / guidelines issued thereunder.

And based on the above examination, 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/Guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks Of The Practicing Company Secretary	Management Response	Remarks
1	Regulation 23(9) Non-compliance with disclosure of related party transactions on consolidated basis.	Regulation 23(9) Non-compliance with disclosure of related party transactions on consolidated basis.	Late submission of disclosure of related party transactions on consolidated basis under Regulation 23(9)	BSE Limited	BSE Limited levied fine on the Company	Late submission of disclosure of related party transactions on consolidated basis under Regulation 23(9) for quarter ended September, 2023	10000/-	Company has filled the same with BSE Limited	Company has filled the same with BSE Limited	
2	Regulation 31(4) of Securities And Exchange Board Of India (Substantial Acquisition Of Shares And Takeovers) Regulations, 2011	Regulation 31(4) of Securities And Exchange Board Of India (Substantial Acquisition Of Shares And Takeovers) Regulations, 2011	Due date of filling disclosure under regulation 31(4) of Securities And Exchange Board Of India (Substantial Acquisition Of Shares	-	-	Due date of filling disclosure under regulation 31(4) of Securities And Exchange Board Of India (Substantial Acquisition	-	The company has filled the same with BSE Limited on 11.04.2023	The company has filled the same with BSE Limited on 11.04.2023	



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			And Takeovers) Regulations, 2011 and Company has filled the same on Bombay after due date			n Of Shares And Takeovers) Regulations, 2011 and Company has filled the same on BSE Limited after due date			
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b) The listed entity has taken the following actions to comply with the observations made in previous reports :

Sr. No.	Observations/ Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations Made in the Secretarial compliance report for the year ended 31.03.2023	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / Deviations and Actions taken / Penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the Actions taken by the listed Entity
1	The company is in the process of appointing new company secretary who will act as new compliance officer of the company	The company is in the process of appointing new company secretary who will act as new compliance officer of the company	Reg. 6(1) of Securities And Exchange Board OF India (listing Obligations and Disclosure Requirements) Regulations, 2015 relating to appointment of Qualified Company Secretary as Compliance officer of the Company	The company has not appointed Qualified Company Secretary as Compliance officer of the Company consequent upon resignation of earlier company Secretary & compliance officer of the company on 16.03.2023	Company appointed Ms. Gayatri Sunderdas Kashela as Company Secretary w.e.f 05.06.2023	Company appointed Ms. Gayatri Sunderdas Kashela as Company Secretary w.e.f 05.06.2023

(j) I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. no.	Particulars	Compliance Status (Yes/No/NA)	Observation/Remarks by PCS
1	<u>Secretarial Standard:</u> The compliances of listed entity are in accordance with the applicable Secretarial Standards (SS) issued by Institute of Company Secretaries of India (ICSI).	Yes	



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2	<p><u>Adoption and timely updation of the Policies:</u></p> <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	<p><u>Maintenance and disclosures on Website:</u></p> <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	
4	<p><u>Disqualification of Director:</u> None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity</p>	Yes	
5	<p><u>Details related to subsidiaries of listed entities have been examined w.r.t.:</u></p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>	N.A. Yes	The Company does not have subsidiary/ material subsidiary.
6	<p><u>Preservation of Documents:</u> 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> The listed entity has conducted performance</p>		



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	evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.	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 N.A.	The Company has obtained prior approval of Audit Committee for all Related party transactions
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	
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>	No	Details of Action taken by Stock Exchange against the listed entity is provided above in this certificate
12	<p><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular</p>	NA	



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	on compliance with the provisions of the LODR Regulations by listed entities.		
13	<u>Additional Non-compliances, if any:</u> No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	Yes	

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. Our responsibility is to report 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 SANJAY DHOLAKIA & ASSOCIATES

Sanjay Rasiklal
Dholakia

Digitally signed by
Sanjay Rasiklal Dholakia
Date: 2024.05.15
17:12:30 +05'30'

SANJAY R DHOLAKIA
Practicing Company Secretary
Proprietor

Membership No.: FCS 2655
CP No.: 1798
Peer Reviewed Firm No. 2036/2022

Date: 15th May, 2024
Place: Mumbai

UDIN: F002655F000370462