



**Date: 28.05.2022**

To,  
The Manager,  
Listing Department,  
National Stock Exchange of India Limited  
'Exchange Plaza', C- Block –G  
Bandrakurla Complex, Bandra (East)  
Mumbai – 400051

**SYMBOL: SONAMCLOCK**

**SUB: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

Dear Sir/Madam,

In compliance of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended read with SEBI Circular No. CIR/CFD/CMD1 /27 /2019 dated 8<sup>th</sup> February, 2019, we are enclosing herewith Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022, issued by M/s H. S. Mehta & Associates, Company Secretaries, Ahmedabad.

Kindly take the above information on record.

Thanking you.  
Yours faithfully,  
For Sonam Clock Limited,



Milankumar S. Ganatra  
Company Secretary & Compliance officer

**Sonam Clock Limited**

CIN : L33302GJ2001PLC039689

**Registered Office** : Survey No.337/P Morbi Rajkot Highway, At Lajai, Tal. Tankara, Dist. Morbi, Gujarat - 363641.  
Phone : + 91 2822 285017, 9978052717 Fax : + 91 2822 285987. email : info@sonamquartz.com, url : www.sonamquartz.com

C-3/204, 2<sup>nd</sup> Floor, Anushruti Tower, Nr. Muktidham Derasar, Thaltej Cross Roads, Ahmedabad - 380 054.  
Tele. No. : (079) 26882215, 40090709 • E-mail : hsm\_cs@yahoo.co.in

**SECRETARIAL COMPLIANCE REPORT OF SONAM CLOCK LIMITED**  
**FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

To,  
Sonam Clock Limited  
Survey No. 337/p, Morbi Rajkot Highway, Lajai,  
Tal. Tankara, Dist. Morbi- 363641

We have examined:

- (a) all the documents and records made available to us and explanation provided by Sonam Clock 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, 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:-

- (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 to the listed entity during the Review Period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the listed entity during the Review Period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the listed entity during the Review Period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the listed entity during the Review Period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



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 as follows:

Sr. No.	Compliance requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/Remark of the Practicing Company Secretary
1	Regulation 31(8)(c) of SEBI (LODR) Regulations,2015	Delay submission of intimation regarding submission of application for re-classification from Promoter group to public by the listed entity to the stock exchanges	The Company submitted application regarding reclassification with stock exchange on 10 <sup>th</sup> February,2022 and due to oversight the intimation regarding submission of reclassification application was submitted with the stock exchange on 15 <sup>th</sup> February,2022 and there is no other malafied intention regarding delayed submission. Also the company submitted all the disclosure with stock exchange on time.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.
- (c) There were no 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 in so far as it appears from my examination of those records.
- (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. – Not applicable as the Company migrated from NSE SME exchange to main board on 7<sup>th</sup> April, 2022 and this is first report issued to the company in compliance of Regulation 24A of SEBI (LODR) Regulations,2015.

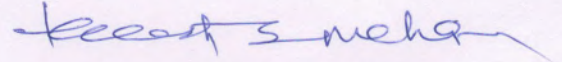


(e) The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

Place: Ahmedabad

Date: 28.05.2022

For H. S. Mehta & Associates,



Hitesh S. Mehta

Practicing Company Secretary

FCS No.:3973

C. P. No.:2471

Peer Review Number: 677/2020

UDIN: F003973D000417397

