



**WEALTH FIRST**

PORTFOLIO MANAGERS LIMITED

Simple process. Expert wealth

**Date: 30<sup>th</sup> June, 2021**

To  
Manager - Listing Department  
National Stock Exchange of India Ltd.  
Exchange Plaza, Plot No. C/1, G Block,  
Bandra-Kurla Complex, Bandra (E),  
Mumbai-400051

**REF: WEALTH FIRST PORTFOLIO MANAGERS LIMITED**

**SCRIP CODE: WEALTH**

**SUB: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED ON 31<sup>ST</sup> MARCH, 2021**

Dear Sir,

In Compliance with Regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 as amended from time to time, we are enclosing herewith the Annual Secretarial Compliance Report for the financial year ended on 31<sup>st</sup> March, 2021 issued by M/s Kunal Sharma & Associates, Practicing Company Secretary.

Kindly take the same on your records and acknowledges receipt of the same.

Thanking you.

Yours faithfully,

**FOR WEALTH FIRST PORTFOLIO MANAGERS LIMITED**

**ASHISH SHAH**  
**MANAGING DIRECTOR**  
**DIN: 00089075**

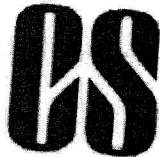


**Encl: Annual Secretarial Compliance Report**

**Wealth First Portfolio Managers Limited**

Capitol House, 10, Paras-II, Near Prahladnagar Garden, Ahmedabad - 380 015  
☎ +91 79 40240000 ✉ contact@wealthfirst.biz 🌐 www.wealth-firstonline.com

**CIN No. - L67120GJ2002PLC040636**



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF WEALTH FIRST PORTFOLIO MANAGERS LIMITED, AHMEDABAD (CIN - L67120GJ2002PLC040636) FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2021**

To  
**Wealth First Portfolio Managers Limited**  
Ahmedabad

We, Kunal Sharma & Associates, Company Secretaries have examined:

- a) All the documents and records made available to us and explanation provided by Wealth First Portfolio Managers Limited, Ahmedabad ("the Listed Entity"),
- b) The filings/ submissions made by the Listed Entity to the Stock exchange,
- c) Website of the Listed entity,
- d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

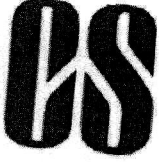
for the financial year ended 31<sup>st</sup> March, 2021 ("Review Period") in respect of compliance with the provisions of:

- 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 upto the extent applicable;
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009/2018 upto the extent applicable;
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 upto the extent applicable;
- d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (not applicable during the Review period)
- e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (not applicable during the Review period)
- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (not applicable during the Review period)
- g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (not applicable during the Review period)
- h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 upto the extent applicable;
- i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 upto the extent applicable;
- j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (not applicable during the Review period)
- k) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 upto the extent applicable.





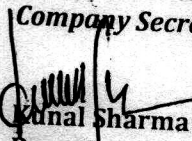
l) and circulars/ guidelines issued thereunder and as applicable to the Company from time to time;

**And based on the above examination, we hereby report that, during the Review Period:**

- a) The Listed Entity has in general complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder,
- 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 are 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:
- d) The listed entity has taken the following actions to comply with the observations made in previous reports: *Not Applicable*

*It is to be noted that due to restrictions arising out of COVID-19 pandemic second wave, report for the review period is issued by examining documents and records provide to us through electronic mode only since physical verification was not possible.*

For Kunal Sharma & Associates  
Company Secretaries

  
Kunal Sharma  
Proprietor  
M. No: F10329  
CP No: 12987



Place: Ahmedabad

Date: 30/06/2021

UDIN: F010329C000546073