



**WEALTH FIRST**  
PORTFOLIO MANAGERS LIMITED  
Simple process. Expert wealth

**Date: 28<sup>th</sup> May, 2022**

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, 2022**

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, 2022 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**

*Aayush Shah*

**AAYUSH SHAH  
COMPANY SECRETARY & COMPLIANCE OFFICER**



**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, 2022**

**To**  
**The Board of Directors**  
**Wealth First Portfolio Managers Limited**  
**Reg. Off: Capitol House, 10 Paras-II, Near Campus Cornor,**  
**Prahaladnagar, Anand Nagar, Ahmedabad - 380051**

We have conducted the Annual Secretarial Compliance Audit of Wealth First Portfolio Managers Limited (hereinafter referred to as "the Company") in terms of compliance with Regulation 24A of the 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 the Company,
- b) The filings/ submissions made by the Company to the Stock Exchange,
- c) Contents on the Website of the Company,
- 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, 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) 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 *upto the extent applicable*;
- c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 *upto the extent applicable*;
- d) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 *upto the extent applicable*;
- e) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 *upto the extent applicable*.
- f) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (*not applicable during the Review period*)
- g) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (*not applicable during the Review period*);
- h) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (*not applicable during the Review period*)

**KUNAL SHARMA**  
Digitally signed by KUNAL SHARMA  
DN: cn=Kunal Sharma,  
o=Kunal Sharma & Associates,  
ou=Company Secretaries,  
email=kunalsharma@ksa.com,  
c=IN, postalCode=380051,  
serialNumber=1,  
dnQualifier=KUNAL SHARMA  
Date: 2022.05.28 13:07:41 +05'30'





- i) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(not applicable during the Review period)*
- j) 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)*
- k) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 *(not applicable during the Review period)*
- 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 Company has in general complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder,
- b) The Company 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 Company / 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) There were no observations in the report for the previous year ended 31<sup>st</sup> March, 2021, hence no actions were required to be taken by the Company.

**For Kunal Sharma & Associates  
Company Secretaries**

KUNAL  
SHARMA  
CS. Kunal Sharma  
Proprietor

M. No: FCS 10329

CP. No: 12987

Firm Code No: I2014GJ1135000

PR No: 1933/2022



**Date: 28<sup>th</sup> May, 2022**

**Place: Ahmedabad**

**UDIN - F010329D000416075**