

June 3, 2020

**BSE Limited**

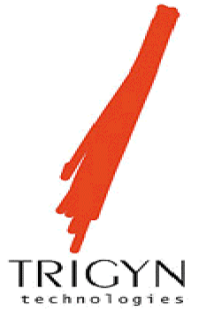
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai – 400 001

Scrip Code: 517562  
Scrip ID: TRIGYN

**National Stock Exchange of India Limited**

Exchange Plaza  
Plot no. C/1, G Block  
Bandra – Kurla Complex  
Bandra (E),  
Mumbai - 400 051.

Company Code: TRIGYN



**Sub: Annual Secretarial Compliance Report for the Financial Year 2019-20.**

Dear Sirs,

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI circular CIR/CFD/CMD1/27/2019 dated February 8, 2019 please find enclosed with Annual Secretarial Compliance Report issued by VKM & Associates Practising Company Secretaries for the year ended March 31, 2020.

Kindly take the same on record.

Thanking you,

Yours faithfully,

**For Trigyn Technologies Limited**

**Mukesh Tank**

**Company Secretary & Compliance Officer**

Encl: as above

VIJAY KUMAR MISHRA

B. Com (Hons), A C A . F.C.S

PARESH D PANDYA

B. Com., A.C.S.

**VKM & ASSOCIATES**

**PRACTISING COMPANY SECRETARIES**

116, Trinity Building, 1st Floor, 227, Dr. C. H. Street, Behind

Parsi Dairy, Marine Lines (E), Mumbai - 2. Tel. : 2207 7267

Fax : 2207 7542 Mob.: 93229 77388

E-mail: vkmassociales@yahoo.com

**Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2020**

To,

**TRIGYN TECHNOLOGIES LIMITED**

27, SDF-1, SEEPZ- SEZ,

Andheri (East), Mumbai-400096.

We, VKM & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **Trigyn Technologies Limited** (“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 year ended 31<sup>st</sup> March, 2020 (“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, 2009;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (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** in respect of matters specified below: -

| <i>Sr. No</i> | <i>Compliance Requirements (Regulations/Circulars/Guidelines including specific clauses)</i>                              | <i>Deviations</i>  | <i>Observations/Remarks</i>   |
|---------------|---|--|---|
| 1             | Regulation 34 of SEBI (LODR) Regulations, 2015 regarding disclosures in the Annual Report for the financial year 2018-19. | The Annual Report for the year ending 31 <sup>st</sup> March, 2019 does not disclose the following information:<br>(i) Certificate of non-disqualification of directors of the company from a practising company secretary.<br>(ii) Details of fees paid to the statutory auditors and details of other entities/network the auditor is part of. | The Company provided clarification on the Stock Exchange platform for the same on 23 <sup>rd</sup> March, 2020. |



(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 my/our examination of those records except: N.A.

The following are the details of 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:

| <i>Sr. No</i> | <i>Action taken by</i>  | <i>Details of Violation</i>  | <i>Details of Action taken</i>                             | <i>Comments on the Actions taken by the Company</i>   |
|---------------|-------------------------|--|--|---|
| 1.            | Bombay Stock Exchange   | BSE issued letter dated June 11, 2019 for Non-compliance of Reg. 29(2&3) of SEBI (LODR) Regulations, 2015 regarding declaration of dividend. | The Stock Exchange imposed a monetary fine of Rs.10,000/-. | The Company replied to the letter issued by the Exchange, stating the reasons for non-compliance of the said regulation and paid the monetary fine. |
| 2.            | National Stock Exchange | NSE issued letter dated June 11, 2019 for Non-compliance of Reg. 29(2&3) of SEBI (LODR) Regulations, 2015 regarding declaration of dividend. | The Stock Exchange imposed a monetary fine of Rs.10,000/-. | The Company replied to the letter issued by the Exchange, stating the reasons for non-compliance of the said regulation and paid the monetary fine. |




(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

| <i>Sr No</i>          | <i>Observations in the previous Reports</i> | <i>Observations made in the Secretarial Compliance Report for the year ended 31<sup>st</sup> March,2019</i> | <i>Actions taken by the Listed Entity; if any</i> | <i>Comments on the Actions taken by the Company</i> |
|-----------------------|---|---|---|---|
| <b>Not Applicable</b> |   |   |   |   |

For VKM & ASSOCIATES  
Company Secretaries



  
(Vijay Kumar Mishra)  
Partner  
C.P.No.4279

**UDIN No. : F005023B000313001**

**Place : Mumbai**

**Date : 03/06/2020**