



Date: 23rd May, 2024

To,
BSE Limited
Listing Department,
P.J. Towers, Dalal Street,
Fort, Mumbai - 400 001

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

Dear Sir/Madam,

Pursuant to the provisions of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2024, issued by CS Vijay L. Vyas, Practicing Company Secretary on 21st May, 2024.

Kindly take the information on your record.

Thanking You,
Yours faithfully,
For Transpek Industry Limited

Alak D. Vyas
Company Secretary &
Compliance Officer
Alak/Richa



Works:
At. & Post: Ekalbara
Taluka: Padra
Dist.: Vadodara - 391 440
Gujarat (India)
Ph.: +91-2662-244444, 244318, 244309
Fax: +91-2662-244439, 244207



Company Identification No.: L23205GJ1965PLC001343

www.transpek.com
WEBSITE
inquiry@transpek.com
EMAIL

CS VIJAY L VYAS

PRACTISING COMPANY SECRETARY

'Shivam', 49, Parshuramnagar Co. Op. Housing Society, Sayajigunj,
VADODARA 390020

Mobile: +91 9979890115 : e-mail: csvlvyas@gmail.com

21ST May, 2024

To,
The Board of Directors,
TRANSPEK INDUSTRY LIMITED
4th Floor, 1038 LILLERIA,
Gotri – Sevasi Road,
VADODARA - 390021

Sir/ Madam,

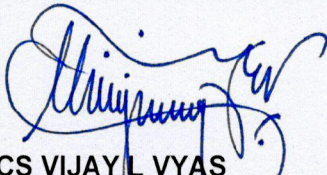
Annual Secretarial Compliance Report for the Financial Year 2023-24.

We have been engaged by **TRANSPEK INDUSTRY LIMITED** (hereinafter referred to as 'the Company') bearing **CIN:- L23205GJ1965PLC001343** whose equity shares are listed on BSE Limited (Security Code: 506687) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

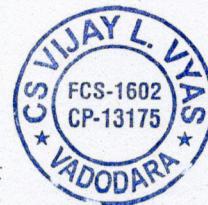
It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.
Annual Secretarial Compliance Report is enclosed.



CS VIJAY L VYAS
Practising Company Secretary
FCS: 1602; COP No.: 13175; PRC: 1836/22
Unique Code No. I2014GJ1154300
UDIN: F001602F000417490



SECRETARIAL COMPLIANCE REPORT

of

TRANSPEK INDUSTRY LIMITED**for the financial year ended 31st March, 2024**

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by TRANSPEK INDUSTRY LIMITED (CIN: L23205GJ1965PLC001343) (hereinafter referred as 'the listed entity'), having its Registered Office at 4th Floor, 1038 LILLERIA, Gotri- Sevasi Road, VADODARA 390021.

Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2024, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I, CS VIJAY L VYAS have examined:

- (a) all the documents and records made available to us and explanation provided by TRANSPEK INDUSTRY 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 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 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; - **Not Applicable as there was no reportable event during the review period;**

- (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 as there was no reportable event during the review period;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - **Not Applicable as there was no reportable event during the review period;**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; - **Not Applicable as there was no reportable event during the review period;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder; 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 there under.
- (b) The listed entity has taken the following actions to comply with the observations made in previous reports -

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 Practising Company Secretary	Management Response	Remarks
1	To Submit the Stand Alone and Consolidated Financial Results and the Auditors' Limited Review Reports thereon within 30 minutes of the conclusion of the Board Meeting as provided under SEBI (LODR) Regulations, 2015.	Regulation 33	Unaudited Stand Alone and Consolidated Financial Results for September, 2022 quarter and Auditors Limited Review Report on consolidated Financial Results submitted within 30 minutes without the Limited Review Report on Stand Alone Financial Results.	BSE Ltd.,	Fine	The Standalone and Consolidated Financial Results for September, 2022 quarter submitted to BSE Ltd., on 09-11-2022 under Regulation 33 of SEBI (LODR) Regulations, 2015, along with Limited Review Report for consolidated Financial Results and inadvertently the Auditors Limited Review Report on the Standalone Financial Results was left out to be submitted simultaneously to BSE Ltd.	Rs.50000/- as per SOP	The Company resubmitted Unaudited Stand Alone and Consolidated Financial Results for September, 2022 quarter alongwith the Auditors Limited Review Reports thereon on 24-11-2022 after 30 minutes of conclusion of the Board Meeting.	It was inadvertently left out to be submitted/uploaded in a hurry to comply within 30 minutes. Fine Paid. Matter put up to the Board and Board response submitted to BSE Ltd.,	The Company has paid the fine on _____, 2022. In respect of subsequent events in FY 2022-23 and 2023-24 the Company has complied with the Regulation 33.

CS VIJAY L VYAS

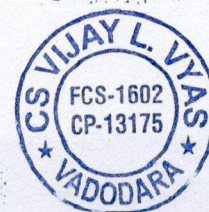
PRACTISING COMPANY SECRETARY

'Shivam', 49, Parshuramnagar Co. Op. Housing Society, Sayajigunj,
VADODARA 390020

Mobile: +91 9979890115 : e-mail: csvlvyas@gmail.com

(c) 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)	Observations/ Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	YES	
2.	Adoption and timely updation of the Policies: (a) All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. (b) All the policies are in conformity with SEBI Regulations and have been reviewed & timely updated, as per the regulations/circulars/guidelines issued by SEBI.	YES	
3.	Maintenance and disclosures on Website: (a) The Listed entity is maintaining a functional website (b) Timely dissemination of the documents/information under a separate section on the website (c) 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.	Disqualification of Director: None of the Directors of the Company is disqualified under Section 164 of Companies Act, 2013.	YES	
5.	Details related to subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NA YES	The Company does not have any Material Subsidiary.



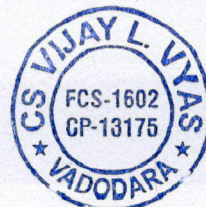
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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under LODR Regulations.	YES	
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors, and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	YES	
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; (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.	YES NA	No such instance informed/ noticed.
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations within the time limits prescribed thereunder.	YES	
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	
	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) 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. (or) The Actions taken against the listed entity/its promoters/Directors/ Subsidiaries either by SEBI or by Stock Exchanges are specified in last column.		No action Taken against the listed entity by SEBI or Stock exchange.



CS VIJAY L VYAS

PRACTISING COMPANY SECRETARY

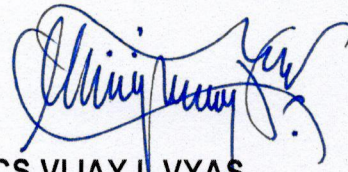
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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
12.	<u>Resignation of Statutory auditors from the listed entity or its material subsidiaries</u> In case of resignation of statutory auditor from the listed entity or its 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 dtd. 11 th July, 2023 on compliance with provisions of the LODR Regulations by listed entities.	NA	The Statutory Auditors of the listed entity have not resigned.
12.	Additional Non-compliances, if any: No additional non-compliance 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 certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We 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.



CS VIJAY L VYAS
Practising Company Secretary
FCS No. 1602: CP No. 13175:
PRC No.: 1836/22
Unique Code No. I2014GJ1154300
UDIN: F001602F000417490

Place: VADODARA
Date: 21st MAY, 2024

