

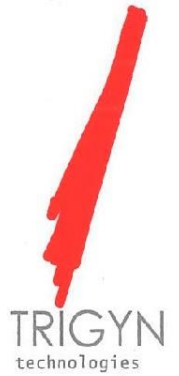
May 28, 2021

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 2020-21.

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 herewith the Annual Secretarial Compliance Report issued by VKM & Associates, Practising Company Secretaries for the year ended March 31, 2021.

Kindly take the same on record.

Thanking you,

Yours faithfully,

For Trigyn Technologies Limited

A handwritten signature in blue ink that reads "Mukesh Tank".

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: vkmassociates@yahoo.com

Annual Secretarial Compliance Report for the year ended 31st March 2021

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 31st 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) 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>

- (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>



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

Sr No	Observations in the previous Reports	Observations made in the Secretarial Compliance Report for the year ended 31 st March, 2020.	Actions taken by the Listed Entity; if any	Comments on the Actions taken by the Company
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 st March, 2019 did not disclose the following information: (i) Certificate of non-disqualification of directors of the company from a practising company secretary. (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 rd March, 2020 and that the Company would exercise caution in future to avoid such recurrence.	The Company has been cautiously maintaining standards of disclosure as required under the regulations.

For VKM & ASSOCIATES
Company Secretaries



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

UDIN : F005023C000384591

Place : Mumbai

Date : 28/05/2021