



SECRETARIAL COMPLIANCE REPORT OF TRISHAKTI INDUSTRIES LIMITED
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2026

[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

I, Khushi Nangalia, Partner of M/s MKB & Associates, Company Secretaries in Practice, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **TRISHAKTI INDUSTRIES LIMITED** ("the listed entity") having its Registered Office at Godrej Genesis, Salt Lake City, Sector-V, 10th Floor, Unit No.-1007, Kolkata-700091, West Bengal. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my/our observations 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 the listed entity has, during the review period covering the Financial Year ended on 31st March, 2026 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I, have examined:

- (a) all the documents and records made available to us and explanation provided by **TRISHAKTI INDUSTRIES 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, 2026 ("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 (as amended from time to time), to the extent applicable, 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;
- (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 and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018

and circulars/ guidelines issued there under;

and based on the above examination, I hereby report that, during the Review Period:

- I. (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: - **As per Annexure I attached to this Report.**

(b) The listed entity has taken the following actions to comply with the observations made in previous reports: **No comments, since there were no observations/ qualifications in the previous year's secretarial compliance report.**

- II. 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 of the Practicing Company Secretary
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	NIL
2.	Adoption and timely updation of the Policies: • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity • All the policies are in conformity with	Yes Yes	NIL NIL





	SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI		
3.	Maintenance and disclosures on Website: • The Listed entity is maintaining a functional website • Timely dissemination of the documents/information under a separate section on the website • 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	NIL NIL NIL
4.	Disqualification of Director: None of the Director(s) of the Listed Entity is/are disqualified under Section 164 of Companies Act, 2013.	Yes	NIL
5.	Details related to Subsidiaries of listed entity have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes Yes	NIL NIL
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 SEBI LODR Regulations, 2015.	Yes	NIL
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 as prescribed in SEBI Regulations.	Yes	NIL





8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) In case no prior approval has been obtained, the listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.	Yes Yes	NIL NIL
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, 2015 within the time limits prescribed thereunder.	Yes	NIL
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	The Company has a software to maintain Structured Digital Database (SDD). However, improvement is necessary with respect to making entries and events related to which entries are to be incorporated in the database. Recommendation to the management in this regard has been made to align with provisions of law.
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/its promoters/ directors/	No	As per Annexure I attached to this





	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.		Report.
12.	Resignation of Statutory Auditors from the Listed Entity or its Material Subsidiaries: In case of resignation of statutory auditor from the listed entity or any of 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 on compliance with the provisions of the LODR Regulations by the listed entities.	N.A.	NIL
13.	Additional non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc.	No	As per Annexure I attached to this Report.

We further report that the compliance with respect to the disclosure requirements of Employee Benefit Scheme Documents in terms of Regulation 46(2)(za) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 is not applicable to the company.

We further report that the process of dematerialisation of warrants allotted pursuant to the preferential issue approved by the shareholders of the Company through their resolution dated 13th August, 2025, in respect of allottees holding their demat accounts with CDSL, is yet to be completed. However, the Listed Entity has filed an application to this effect and the same is pending.

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 report 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 Securities and Exchange Board of India (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.

For MKB & Associates
Company Secretaries
Firm Reg No: P2010WB042700


Khushi Nangalia
Partner

Date: 30.05.2026
Place: Kolkata
UDIN: A072100H000553713

Membership No. 72100
COP No. 26807
Peer Review Certificate No.: 6825/2025

ANNEXURE - I

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 Practicing Company Secretary	Management Response	Remarks
1.	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Regulation 17(F)	The Board of Directors of the Listed Entity did not comprise of 50% Non-Executive Directors and at least half of the Board as Independent Directors during the period from 1 st October, 2025 till 3 rd December 2025.	BSE Limited	Imposition of fine	Consequent upon applicability of Regulation 17, the listed entity has not complied with the provisions of Regulation 17(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015, as although the Chairperson of the Board being a Promoter Executive Director, the Board did not comprise of at least fifty percent Non-executive Directors and half of the Board did not consist of Independent Directors from 1 st	Rs. 3,77,600/- (inclusive of GST)	The Company has filed an application for waiver of the said fine on 9 th March, 2026. However, the response/update from BSE Limited in this regard is still awaited.	The non-compliance occurred inadvertently as the Company was unable to identify a suitable candidate to fill the vacancy within the prescribed timeline. The company has successfully filled the vacancy. Ms. Yashvi Agarwal (DIN: 11401084) was appointed as an Independent Director from 4 th December, 2025. The Company filed an application for waiver of the said fine on 9 th March, 2026.	--



Trishakti Industries Limited

ANNEXURE - I

2.	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Regulation 47	The Newspaper Advertisment with respect to the Financial Results for the quarter ended September, 2025 and December, 2025 did not contain Quick Response Code.	--	--	October, 2025 till 3 rd December, 2025. The listed entity has not fully complied with the provisions of Regulation 47(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as the Newspaper Advertisment with respect to the Financial Results for the quarter ended September, 2025 and December, 2025 did not contain Quick Response Code.	--	The said requirement has been complied with in the newspaper advertisement published for the Financial Results for the quarter ended 31 st March, 2026.	The omission was inadvertent. The Company had included the QR Code in the newspaper advertisement for the Financial Results of the quarter ended 31 st March, 2026. The Listed Entity also complied with the requirement when publishing the Financial Results for the quarter ended 30 th June, 2025.	--
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