



26th May, 2026

To,

BSE Limited P.J. Towers, Dalal Street, Fort, Mumbai-400001 Scrip Code: 500418	National Stock Exchange of India Limited Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051 NSE Symbol: TOKYOPLAST
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Dear Sir/Madam,

Subject: Compliance under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith the Annual Secretarial Compliance Report duly issued by Ashika Shetty, Practising Company Secretary, for the financial year ended March 31, 2026.

Please take the same on record.

Thanking you,

Yours faithfully,

For Tokyo Plast International Limited

Velji Shah
Managing Director
DIN: 00007239

TOKYO PLAST *International Ltd.*

ADMIN. OFFICE: 401-A, 4th Floor, Gala Quest, Paranjpe B Scheme Road no.1, Vile Parle (East), Mumbai – 400 057, India.
Tel : 91-22-6145 3300 * Fax : 91-22-6691 4499 * E-mail : info@tokyoplast.com * Website : www.tokyoplast.com
REGD. OFFICE : Plot No.363/1, (1,2,3), Shree Ganesh Industrial Estate, Kachigaum Road, Daman – 396 210(U.T.), India.
Tel : (0260) 2242977 / 2244471 * Fax : (0260) 2243271 * CIN – L25209DD1992PLC009784

ASHIKA SHETTY

Company Secretary

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SECRETARIAL COMPLIANCE REPORT OF TOKYO PLAST INTERNATIONAL LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2026

I, Ashika Shetty, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to me and explanation provided by **Tokyo Plast International Limited** (hereinafter referred as "the listed entity"),
- (b) the filings / submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity and
- (d) any other documents / filings, as may be relevant, which has been relied upon to make this Report,

for the financial 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, 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;



- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - **(Not applicable during the review period)**;
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **(Not applicable during the review period)**;
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - **(Not applicable during the review period)**;
- (f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - **(Not applicable during the review period)**;
- (g) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and
- (h) other regulations as applicable

and circulars and guidelines issued thereunder;

and 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 thereunder, except in respect of matters specified below



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 (PCS)	Management Response	Remarks
1.	The Listed entity has not filled vacancy caused by resignation of Company Secretary/Compliance Officer within a period of three months.	Regulation 6 (1) and 6 (1A) of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	The Listed entity has not filled vacancy caused by resignation of Company Secretary/Compliance Officer within a period of three months.	BSE Ltd	Penalty	Consequent to resignation of Ms. Swagata Indulkar as Company Secretary and Compliance officer effective 4 February 2025, the listed entity had not filled the vacancy caused by the resignation within a period of 3 months as required under Regulation 6 (1A) of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	Rs. 14,160	Consequent to resignation of Ms. Swagata Indulkar as Company Secretary and Compliance officer effective 4 February 2025, the listed entity had not filled the vacancy caused by the resignation within a period of 3 months as required under Regulation 6 (1A) of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	The listed entity has subsequently appointed Ms. Sonal Gandhi as Company Secretary and Compliance officer effective 16 May 2025	-
2.	The Listed Entity has delayed in filing certificate under Regulation 74(5) of SEBI (Depository and Participant Regulations,	Regulation 74(5) of SEBI (Depository and Participant Regulations), 2018	The Listed Entity has delayed in filing certificate under Regulation 74(5) of SEBI (Depository and Participant Regulations),	-	-	The Listed Entity has delayed in filing certificate under Regulation 74(5) of SEBI (Depository and Participant Regulations,	-	The Listed Entity has delayed in filing certificate under Regulation 74(5) of SEBI (Depository and Participant Regulations,	-	-



	s) Regulations, 2018 for the quarter ended 31 March 2025		2018 for the quarter ended 31 March 2025			2018 for the quarter ended 31 March 2025		2018 for the quarter ended 31 March 2025		
3.	The listed entity has not published financial results in the language of the region where the registered office of the listed entity is situated.	Regulation 47 of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015,	The listed entity has not published financial results in the language of the region where the registered office of the listed entity is situated.	-	-	Though the listed entity has published financial results in the regional language newspaper - Janadesh, the same has not been published in the regional language i.e. Gujarati but has been published in English.	-	Though the listed entity has published financial results in the regional language newspaper - Janadesh, the same has not been published in the regional language i.e. Gujarati but has been published in English.	-	-
4.	The listed entity has delayed in closing the trading window and thereby delayed in intimating the stock exchange regarding the same for quarter ended 31 March 2025	Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015	The listed entity has delayed in closing the trading window and thereby delayed in intimating the stock exchange regarding the same for quarter ended 31 March 2025	-	-	The listed entity was required to close the trading window from 1 April 2025 till 48 hours after publication of financial results for the year ended on 31 March 2025. However, the intimation of the same to stock exchange was given on 18 April 2025, thereby indicating a delay in closure of the trading window.	-	The listed entity was required to close the trading window from 1 April 2025 till 48 hours after publication of financial results for the year ended on 31 March 2025. However, the intimation of the same to stock exchange was given on 18 April 2025, thereby indicating a delay in closure of the trading window.	-	-



5.	The listed entity shall ensure that hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form. However, the shares held by Mr. Haresh V Shah, promoter are not in dematerialised form.	Regulation 31(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015	The shares held by Mr. Haresh V Shah, promoter are not in dematerialised form.	BSE Ltd	Clarification was sought	The shares held by Mr. Haresh V Shah, promoter are not in dematerialised form.		The shares held by Mr. Haresh V Shah, promoter are not in dematerialised form.	The Management had responded to the clarification	
6.	The listed entity has not made disclosures to the stock exchange under Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for 11,198 shares acquired by Priti Haresh Shah during the quarter April-June 2025	Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015	The listed entity has not made disclosures to the stock exchange under Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for 11,198 shares acquired by Priti Haresh Shah during the quarter April-June 2025	-	-	The listed entity has not made disclosures to the stock exchange under Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for 11,198 shares acquired by Priti Haresh Shah during the quarter April-June 2025		The listed entity has not made disclosures to the stock exchange under Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for 11,198 shares acquired by Priti Haresh Shah during the quarter April-June 2025	-	-



Note:

1. The Listed entity has filed shareholding pattern for the quarter ended on 31 March 2025 and 30 June 2025 on time, however pursuant to query received from BSE, the revised filings was filed beyond the prescribed time.
2. The Listed entity has filed Integrated filings of Financial Results for quarter and nine months ended 30 September 2025 on time, however pursuant to query received from BSE, the revised filing was filed beyond the prescribed time.
3. The Listed entity has submitted PDF of unaudited financial results for the quarter ended 30 September 2025 and 31 December 2025 under the heading 'Financial Results', however the same was not separately disclosed under the heading 'Outcome of the Board Meeting'.

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

Sr. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31st March, 2025	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation/ Deviations and actions taken/penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	Outcome of the Board Meeting dated 8 th August, 2024 does not contain the financial results for the quarter ended 30 th June 2024. The revised outcome with the financial results was submitted on 9 th August, 2024	Outcome of the Board Meeting dated 8 th August, 2024 does not contain the financial results for the quarter ended 30 th June 2024. The revised outcome with the financial results was submitted on 9 th August, 2024	Regulation 30 of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015-	Outcome of the Board Meeting dated 8 th August, 2024 does not contain the financial results for the quarter ended 30 th June 2024. The revised outcome with the financial results was submitted on 9 th August, 2024	Management has noted the same.	-
2.	Intimation of Cessation of Mr. Chimanlal Andrjibhai Kutchhi, Non-executive Director of the listed entity was submitted to the stock exchange	Intimation of Cessation of Mr. Chimanlal Andrjibhai Kutchhi, Non-executive Director of the listed entity was submitted to the	Regulation 30 of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015	Intimation of Cessation of Mr. Chimanlal Andrjibhai Kutchhi, Non-executive Director of the listed entity was submitted to the	Management has noted the same.	-



	beyond the prescribed time.	stock exchange beyond the prescribed time.		stock exchange beyond the prescribed time.		
3.	<p>The Chairperson being an Executive Director, at least half of the Board should comprise of Independent Directors.</p> <p>Upon the cessation of Mr. Chimanlal Andrjibhai Kutchhi (DIN: 00058092) as Independent Director of the Company effective 30 September 2024 the number of Independent Directors was reduced to less than half.</p> <p>Consequently Mrs. Kinnari Sunny Charla (DIN: 10748676) was appointed as Independent Director of the Company by the Board on 2 September 2024 and regularised by the shareholders at the AGM held on 30 September 2024, however relevant Forms for appointment of Mrs. Kinnari Sunny Charla (DIN: 10748676) was not filed with MCA.</p>	<p>The Chairperson being an Executive Director, at least half of the Board of Independent Directors.</p> <p>Upon the cessation of Mr. Chimanlal Andrjibhai Kutchhi (DIN: 00058092) as Independent Director of the Company effective 30 September 2024 the number of Independent Directors was reduced to less than half.</p> <p>Consequently Mrs. Kinnari Sunny Charla (DIN: 10748676) was appointed as Independent Director of the Company by the Board on 2 September 2024 and regularised by the shareholders at the AGM held on 30 September 2024, however relevant Forms for appointment of Mrs. Kinnari Sunny Charla (DIN: 10748676) was not filed with MCA.</p>	<p>Regulation 17 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2018 - Composition of Board of Directors</p>	<p>The Chairperson being an Executive Director, at least half of the Board of Independent Directors.</p> <p>Upon the cessation of Mr. Chimanlal Andrjibhai Kutchhi (DIN: 00058092) as Independent Director of the Company effective 30 September 2024 the number of Independent Directors was reduced to less than half.</p> <p>Consequently Mrs. Kinnari Sunny Charla (DIN: 10748676) was appointed as Independent Director of the Company by the Board on 2 September 2024 and regularised by the shareholders at the AGM held on 30 September 2024, however relevant Forms for appointment of Mrs. Kinnari Sunny Charla (DIN: 10748676) was not filed with MCA.</p>	<p>Form DIR-12 for appointment of Kinnari Sunny Charla (DIN: 10748676) as Independent Director have now been filed.</p>	-



I. 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	<p><u>Secretarial Standards:</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).</p>	Yes	The listed entity has prima facie complied.
2	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars /guidelines issued by SEBI. 	Yes Yes	N.A. N.A.
3	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> 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	N.A. N.A. N.A.
4	<p><u>Disqualification of Director:</u></p> <p>None of the Directors of the listed entity are</p>	Yes	N.A.



	disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.		
5	<p><u>Details related to subsidiaries of listed entities have been examined w.r.t.:</u></p> <p>(a) Identification of material subsidiary Companies.</p> <p>(b) Disclosure Requirements of material as well as other subsidiaries.</p>	<p>NA</p> <p>Yes</p>	<p>As informed by listed entity, the listed entity does not have any material subsidiary. However, the listed entity has one wholly owned subsidiary- Pinnacle Drinkware Private Limited.</p>
6	<p><u>Preservation of Documents:</u></p> <p>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.</p>	Yes	N.A.
7	<p><u>Performance Evaluation:</u></p> <p>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.</p>	Yes	N.A.
8	<p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) In case no prior approval is obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved ratified/rejected by the audit committee.</p>	<p>Yes</p> <p>N.A.</p>	<p>N.A.</p> <p>N.A.</p>



9	<p><u>Disclosure of events or information:</u></p> <p>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.</p>	Yes	N.A.
10	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	No	<p>The listed entity has software for the structured digital database, however on our visit to the office for verification of the software, the data was inaccessible due to technical reasons, hence we are unable to give our opinion on the completeness of the data maintained.</p>
11	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>No action(s) has been 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.</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column</p>	No	<p>Provided in separate paragraph in table (a) above.</p>
12	<p><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></p> <p>In case of resignation of statutory auditor from the</p>		



	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 listed entities.	N.A.	N.A.
13	<u>Additional non-compliances, if any:</u> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. except as reported above.	Yes	N.A.

I further, report that the listed entity is in compliance/not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations - **(Not applicable during the review period).**

Note:

1. **The Company has made an application for delisting of securities from the Calcutta stock exchange (CSE) on 26.11.1999 but till date the Company has not received any response in respect of delisting. However, the Company was filing all the necessary documents as per listing agreement till year 2013 as the CSE was barred from trading on its platform by SEBI from April 2013.**

Assumptions & Limitation of scope and Review:

1. The 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. My responsibility is to report based upon my examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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.

Date: 22 May 2026

Place: Mumbai



Ashika

Ashika Shetty

Practicing Company Secretary

ACS No.: 46804 / COP No.: 27779

Peer Review Cert. No.: 6493/2025

UDIN: A046804H000441627