



May 28, 2026

<b>BSE Limited</b> Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001.  Scrip Code: 517562 Scrip ID: TRIGYN	<b>National Stock Exchange of India Limited</b> “Exchange Plaza”, Bandra Kurla Complex, Bandra (East), Mumbai – 400 051.  Company Code: TRIGYN
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**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2026.**

In terms of the Regulation 24A of Securities and Exchange Board of India (Listing obligations and Disclosure Requirement) Regulations, 2015 read with the applicable Circulars issued by the Securities and Exchange Board of India, we are enclosing herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2026, issued by M/s. VKM & Associates, Practicing Company Secretaries.

This is for your information and records.

Yours faithfully,  
**For Trigyn Technologies Limited**

**Anmol Chaturvedi**  
**Company Secretary & Compliance Officer**  
**Membership No. A 73871**

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**Trigyn Technologies Limited**

27 SDF-1, SEEPZ, Andheri (East), Mumbai 400 096, India.

Phone: +91-22-6140-0909 | Email: ro@trigyn.com

www.trigyn.com | CIN: L72200MH1986PLC039341

VIJAY KUMAR MISHRA

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

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**VKM & ASSOCIATES**

**PRACTISING COMPANY SECRETARIES**

406, Garnet Paladium,

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**Annual Secretarial Compliance Report for the year ended March 31, 2026**

**The Members,**

**Trigyn Technologies Limited**

**27, SDF - I, SEEPZ- SEZ,**

**Andheri (East),**

**Mumbai - 400 096.**

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by “**Trigyn Technologies Limited**” (hereinafter referred as ‘the listed entity’ or ‘TTL’), having its registered office at **27, SDF - I, SEEPZ- SEZ, Andheri (East), Mumbai - 400 096**. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our 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, we hereby report that the listed entity has, during the review period covering the financial year ended on March 31, 2026, complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

We, VKM & Associates, Practicing Company Secretaries, have examined:

- a. All the documents and records made available to us and explanation provided by 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 financial year ended **March 31, 2026** (“Review Period”) in respect of compliance with the provisions of:-
  - i. The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
  - ii. 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”);



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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 to the Company 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 (Buy-back of Securities) Regulations, 2018 – Not applicable to the Company during the review period;
- e. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;  
  
- *During the Review Period, the Company received in-principle approval from BSE Limited and National Stock Exchange of India Limited for listing of 4,50,000 equity shares to be issued under Trigyn Technologies Limited Employee Stock Option Plan 2025.*
- f. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 – **Not applicable to the Company during the review period;**
- g. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- i. Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

and circulars / guidelines issued thereunder, including any statutory modification(s) or re-enactment(s) thereof for the time being in force.



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Thereby, based on the above examination, we hereby report that, during the Review Period:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation s/Remarks by PCS
1.	<b>Secretarial Standard</b> The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	YES	—
2.	<b>Adoption and timely updation of the Policies:</b> 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 has been reviewed & timely updated as per the regulations/circulars/ guidelines issued by SEBI.	a. YES b. YES	—
3.	<b>Maintenance and disclosures on Website:</b> 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 redirects to the relevant document(s)/ section of the website.	a. YES b. YES c. YES	—
4.	<b>Disqualification of Director:</b> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.	YES	—
5.	<b>To examine details related to Subsidiaries of listed entities:</b> a. Identification of material subsidiary companies. b. Requirements with respect to disclosure of material as well as other subsidiaries.	a. YES b. YES	—
6.	<b>Preservation of Documents:</b> 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	—



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7.	<b>Performance Evaluation:</b> 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	—
8.	<b>Related Party Transactions:</b> 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.	a. YES b. N.A.	—
9.	<b>Disclosure of events and information:</b> The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	YES	—
10.	<b>Prohibition of Insider Trading</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	YES	—
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No Actions 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	YES	—
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b> In case of resignation of statutory auditor from the listed 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 SEBI LODR Regulations by listed entities.	N.A	—
13.	<b>Additional Non-compliances, if any:</b>	As mentioned below	—



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- (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	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount (Rs.)	Observation/ Remarks of PCS	Management Remark	Remarks
1	Submission of disclosure of Related Party Transactions within prescribed timeline	Regulation 23(9) of SEBI (LODR) Regulations, 2015	Delay in submission of RPT disclosure for the half year ended September 30, 2025	BSE & NSE	Fine / SOP levy	Stock Exchanges levied fine for non-compliance / delay under Regulation 23(9) for the half year ended September 30, 2025	₹5,900 each to BSE and NSE	The Company has paid the fine levied.	The delay was procedural in nature and the fine has been paid.	Fine paid on December 18, 2025.

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

Sr. No	Compliance Requirement	Regulation/ Circular No.	Deviations	Action Take by	Type of Action	Details of Violation	Fine Amount (Rs.)	Observation/ Remarks of PCS	Managemen Remark	Remarks
	NA									

- (c) 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.

For VKM & ASSOCIATES  
Company Secretaries



*Vijay Kumar Mishra*  
(Vijay Kumar Mishra)

Partner

C.P.No.4279

FCS No.: 5023

PR. No. : 1846/2022

UDIN : F005023H000501145

Place : Mumbai

Date : May 27, 2026