



TRITON CORP LIMITED

May 29th 2025

To
Corporate Service Dept.
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400001.

Scrip Code: 523387

Sub: **Annual Secretarial Compliance Report under Regulation 24 (A) SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith, Annual Secretarial Compliance Report for the financial year ended 31st March, 2025.

Kindly take the same on your record.

Thanking you,
Yours Faithfully,

For Triton Corp Limited

MEENA Digitally signed
by MEENA
RASTOGI
Date: 2025.05.29
14:17:51 +05'30'

Meena Rastogi
Director
DIN: 01572002



A.K. Choudhary & Associates
Company Secretaries

Contact No: 9818268275;

Email ID: - csakchoudhary@gmail.com

B-196, Mohan Garden,
Uttam Nagar, New Delhi-110059
FRN- S2018DE638700
PR- 3869/2023

Annual Secretarial Compliance Report of M/s Triton Corp Limited for the financial year ended 31st March 2025

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

I, A K Choudhary & Associates, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. Triton Corp 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 Report.

for the financial year ended 31st March 2025 (“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 SEBI;

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- (a) Securities and Exchange Board of India (LODR) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable 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 during the review period):**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable during the review period):**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, **(Not applicable during the review period):**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(Not applicable during the review period):**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



A.K. Choudhary & Associates
Company Secretaries

Contact No: 9818268275;

Email ID: - csakchoudhary@gmail.com

B-196, Mohan Garden,
Uttam Nagar, New Delhi-110059

FRN- S2018DE638700

PR- 3869/2023

(i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulation, 2021.(**Not applicable during the review period**):

(j) other regulations as applicable.

and circulars/ guidelines issued thereunder;

Ajay Kumar Choudhary

Digitally signed by Ajay
Kumar Choudhary
Date: 2025.05.28
12:48:21 +05'30'



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:

<i>Sr. No.</i>	<i>Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)</i>	<i>Regulation/ Circular No.</i>	<i>Deviations</i>	<i>Action Taken by</i>	<i>Type of Action</i>	<i>Details of Violation</i>	<i>Fine Amount</i>	<i>Observations /Remarks of the Practicing Company Secretary (PCS)</i>	<i>Management Response</i>	<i>Remarks</i>
1.	Section 21A of Securities Contracts (Regulations) Act, 1956 read with Rule 21 of Securities Contract (Regulations) Rules, 1957 and SEBI (Regulatory Fee on Stock Exchange) Regulations, 2006	Section 21A, Rule 21	During the Year Company could not pay the listing Fees pertaining to Previous Year	Regulation 14 SEBI, LODR, Regulation, 2015	Suspended on Stock Exchange	Non Compliance of Section 21A of Securities Contracts (Regulations) Act, 1956 read with Rule 21 of Securities Contract (Regulations) Rules, 1957 and SEBI (Regulatory Fee on Stock Exchange) Regulations, 2006 related to non payment of listing Fees	NA	As on November 04, 2025 total outstanding Listing Fees & LODR penalties is Rs. 29,50,000/- as per books of accounts of company	The company has confirmed that the outstanding Listing Fees along with Annual Listing Fees for the Financial Year 2024-25 total Amount Rs. 33,33,500/- was paid.	NA
2.	Regulation 76 of SEBI (Depositories & Participants) Regulation 2018	Regulation 76	Non-submission of Reconciliation of share Capital audit Report.		Fine	Non-submission of Reconciliation of share Capital audit Report.	NA	Non-submission of Reconciliation of share Capital audit Report.	Compliance done	



3.	Regulation 6(1) of SEBI (LODR) Regulations, 2015		Non-compliance with requirement to appoint a qualified company secretary as the compliance officer		Fine	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer	Rs. 1,000 per day	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer	Compliance done	
4.	Regulation 7(1) of SEBI (LODR) Regulations, 2015		Non-compliance with requirement to appoint share transfer agent		Fine	Non-compliance with requirement to appoint share transfer agent	Rs. 1,000 per day	Non-compliance with requirement to appoint share transfer agent	Compliance done	
5.	Regulation 13(3) of SEBI (LODR) Regulations, 2015		Non-submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances		Fine	Non-submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances	Rs. 1,000 per day	Non-submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances	Compliance done	

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

<i>Sr. No.</i>	<i>Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)</i>	<i>Observations made in the Secretarial Compliance report for the year ended (The years are to be</i>	<i>Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)</i>	<i>Details of violation / Deviations and actions taken /penalty imposed, if any, on the listed entity</i>	<i>Remedial actions, if any, taken by the listed entity</i>	<i>Comments of the PCS on the actions taken by the listed entity</i>
----------------	---	---	--	---	---	--



A.K. Choudhary & Associates
Company Secretaries
Contact No: 9818268275;
Email ID: - csakchoudhary@gmail.com

B-196, Mohan Garden,
Uttam Nagar, New Delhi-110059
FRN- S2018DE638700
PR- 3869/2023

		<i>mentioned)</i>				
1. NA	Section 21A of Securities Contracts (Regulations) Act, 1956 read with Rule 21 of Securities Contract (Regulations) Rules, 1957 and SEBI (Regulatory Fee on Stock Exchange) Regulations, 2006	Section 21A, Rule 21	During the year the company has confirmed that the outstanding Fees along with Annual Listing Fees for the Financial Year 2024-25 total Amount Rs. 33,33,500/- was paid	Non Compliance of Section 21A of Securities Contracts (Regulations) Act, 1956 read with Rule 21 of Securities Contract (Regulations) Rules, 1957 and SEBI (Regulatory Fee on Stock Exchange) Regulations, 2006 related to non payment of listing Fees	Listing Fees up to financial year 2024-25 paid by the Company	NA
2.	Regulation 76 of SEBI (Depositories & Participants) Regulation 2018	Regulation 76	Non-submission of Reconciliation of share Capital audit Report.	Fine of Rs. 1,000 per day	Compliance done	
3.	Regulation 6(1) of SEBI (LODR) Regulations, 2015	Regulation 6(1)	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer	Fine of Rs. 1,000 per day	Compliance done	
4.	Regulation 7(1) of SEBI (LODR) Regulations, 2015	Regulation 7(1)	Non-compliance with requirement to appoint share transfer agent	Fine of Rs. 1,000 per day	Compliance done	
5.	Regulation 13(3) of SEBI (LODR) Regulations, 2015	Regulation 13(3)	Non-submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances	Fine of Rs. 1,000 per day	Compliance done	



A.K. Choudhary & Associates
Company Secretaries

Contact No: 9818268275;

Email ID: - csakchoudhary@gmail.com

B-196, Mohan Garden,
Uttam Nagar, New Delhi-110059

FRN- S2018DE638700

PR- 3869/2023

- I. I/we 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)	Observation s/ 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 of India (ICSI).	YES	NONE
2.	Adoption and timely updation of the Policies: <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	NONE
3.	Maintenance and disclosures on Website: <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	YES YES	NONE NONE



A.K. Choudhary & Associates
Company Secretaries

Contact No: 9818268275;

Email ID: - csakchoudhary@gmail.com

B-196, Mohan Garden,
Uttam Nagar, New Delhi-110059

FRN- S2018DE638700

PR- 3869/2023

	<ul style="list-style-type: none">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.	NO	NOT APPLICABLE
4.	Disqualification of Director(s): None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	YES	NONE
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 NA	NONE NONE
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	NONE



A.K. Choudhary & Associates
Company Secretaries

Contact No: 9818268275;
Email ID: - csakchoudhary@gmail.com

B-196, Mohan Garden,
Uttam Nagar, New Delhi-110059
FRN- S2018DE638700
PR- 3869/2023

7.	<p>Performance Evaluation:</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	NONE
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of audit committee for all related party transactions;</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether transactions were subsequently approved/ratified/rejected by the audit committee.</p>	NA NA	NONE NONE
9.	<p>Disclosure of events or information:</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	NONE
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	YES	NONE



A.K. Choudhary & Associates
Company Secretaries

Contact No: 9818268275;

Email ID: - csakchoudhary@gmail.com

B-196, Mohan Garden,
Uttam Nagar, New Delhi-110059

FRN- S2018DE638700

PR- 3869/2023

11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</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 (or) 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>	YES	NONE
12.	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>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 listed entities.</p>	NA	NONE
13.	<p>Additional Non-compliances, if any:</p> <p>No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.</p>	YES	NONE

We 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**

Assumptions & limitation of scope and review:



A.K. Choudhary & Associates
Company Secretaries

Contact No: 9818268275;

Email ID: - csakchoudhary@gmail.com

B-196, Mohan Garden,
Uttam Nagar, New Delhi-110059

FRN- S2018DE638700

PR- 3869/2023

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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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 A.K.Choudhary & Associates,
Company Secretaries,

Ajay Kumar
Choudhary

Digitally signed by Ajay Kumar
Choudhary
Date: 2025.05.28 12:47:39 +0530

CS Ajay Kumar Choudhary
Proprietor

FCS No. : 12691

C.P No. : 21297

UDIN: F012691G000463284

Date: 28-05-2025

Place: Delhi