

TGL/2025-26/SEC-014

Date: 30-05-2025

To,  
The Manager  
Department of Corporate Services-Listing  
**BSE Limited**  
16th floor, P J Towers,  
Dalal Street, Mumbai- 400001

**Sub: Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular CIR/CFD/CMD1/27/2019 dated 08.02.2019**  
**Ref: Triveni Glass Limited (Scrip Code 502281)**

This is further to our letter dated 26-05-2025, in which we have filed Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular CIR/CFD/CMD1/27/2019 dated 08.02.2019, for the quarter and year ended 31.03.2025 on 26-05-2025. To ensure completeness and compliance, the Company is submitting a revised ASCR incorporating these disclosures, including the statement under **Regulation 46(2)(za)** in accordance with the **SEBI Circular dated 31st December 2024**.

We confirm that the Company has not implemented any Employee Benefit Scheme during the year.

The revised report is being filed within the prescribed timeline. Kindly take the same on record.

This is for your information and record purpose.

**Thanks and regards**  
**For Triveni Glass Limited**

Tanushree  
Chatterjee

Digitally signed by  
Tanushree Chatterjee  
Date: 2025.05.30 15:08:23  
+05'30'

**Tanushree Chatterjee**  
**Company Secretary**

Encl.: Revised Annual Secretarial Compliance Report

**Regd. Off.:**

1, Kanpur Road, Allahabad - 211001, India  
Phone : +91-532-2407325  
Fax : +91-532-2407450  
E-mail : akd@triveniglassltd.com  
Website : www.triveniglassltd.com  
CIN No. : L26101UP1971PLC003491

# AYUSH SINHA AND ASSOCIATES

Mob: 8588843596

Email: [ayushsinhaandassociates@gmail.com](mailto:ayushsinhaandassociates@gmail.com)

To,  
The Board of Directors  
Triveni Glass Limited,  
1, Kanpur Road,  
Prayagraj-211011(U.P.)

**Sub: Revised Annual Secretarial Compliance Report for the Financial Year 2024-25.**

Dear Sir,

We have been engaged by Triveni Glass Limited (hereinafter referred to as the 'Company') bearing CIN: L26101UP1971PLC003491 whose equity shares are listed on BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligation and Disclosures Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively. Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon. Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed and marked as Annexure A.

**For Ayush Sinha & Associates**  
**Company Secretaries**

**Ayush Sinha**  
Proprietor

ACS: 51207  
COP No.: 18577  
PR No.: 4555/2023  
UDIN: A051207G000492637

PLACE: Prayagraj  
DATE: 29/05/2025

Res: G-I-559, "Ghanshyam Niwas", Phase-II, Kalindipuram, Prayagraj, U.P.-211011  
Off: 89/276, S-4, Vasant Vihar Apartments, Drummond Road, Prayagraj, U.P.-211011

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"Annexure A"

## REVISED ANNUAL SECRETARIAL COMPLIANCE REPORT

of

TRIVENI GLASS LIMITED

(CIN: L26101UP1971PLC003491)

For the Financial Ended 31.03.2025

(Pursuant to Regulation 24(A) of the SEBI (LODR), Regulations, 2015

I /We Ayush Sinha and Associates have examined:

- a) All the documents and records made available to us and explanation provided by M/s Triveni Glass 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 31<sup>st</sup> March, 2025 ("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, Circular, Guidelines issued thereunder and
  - II. The Securities Contracts (Regulations) Act, 1956 ("SCRA"), rules made thereunder and Regulations, Circular, 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:

- I. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- II. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018,  
Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011,
- III. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- IV. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014
- V. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- VI. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- VII. Securities and Exchange Board of India (Prohibition of Insider Trading)

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## VIII. Other regulation as applicable.

\*The Regulations or Guidelines, as the case may be were not applicable to the listed entity for 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 company	Type of action	Details of violation	Fine amount	Observations Remarks of the Practicing Company Secretary	Management Responses	Remark
	Regulation 44(3) of SEBI (LODR) 2015,	Regulation 44(3) of sebi (lodr) 2015,	Company did not make disclosure within 2 working days of the conclusion of the meeting	The company had uploaded the voting result within 2 working days of conclusion of the meeting. However in xbrl, in place of date of agm, (10.09.2024), date of board meeting, (22.07.2024) was inadvertently entered. When query from exchange was raised, the company immediately filed the revised voting result with correct details	Penalty	Company did not make disclosure within 2 working days of the conclusion of the meeting	11,800	The company has filed revised filing and also paid penalty of Rs 11,800.	The date of agm was inadvertently mentioned as 22/07/2024 which was the date of board meeting.	The company has filed revised filing and also paid penalty of Rs 11,800.

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C.P. No.-18577  
I.I. No.-A51207

  
Secretary

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Sr. No.	Compliance Requirement (Regulations/circulars / Guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by company	Type of action	Details of violation	Fine amount	Observations Remarks of the Practicing Company Secretary	Management Responses	Remark
	Regulation 30	Regulation 30	Company submitted late disclosure under Regulation 30 w.r.t appointment of company secretary.	The company forwarded its reply stating the said appointment was approved in the board meeting held on 29.01.2024 and disclosure was made on that day only.	Advisory letter	Company submitted late disclosure under Regulation 30 w.r.t appointment of company secretary	Advisory letter	The company forwarded its reply stating the appointment was approved in the board meeting held on 29.01.2024 and disclosure was made on that day only.	The company had filed its response before BSE.	The company forwarded its reply stating the said appointment was approved in the board meeting held on 29.01.2024 and disclosure was made on that day only.
	Regulation 7(3) of SEBI (LODR) 2015	Regulation 7(3) of SEBI (LODR) 2015	Delayed filing of compliance certificate for the month of March 2024	Delayed filing of compliance certificate for the month of March 2024	Mail from exchange	The company filed the compliance certificate on 30.05.2024		Delayed filing of compliance certificate for the month of March 2024	This was the first time delay observed by the company	The filing was done by company

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C.P. No.-18577  
 I.I. No.-A51207

*Ayush Sinha*  
 Secretary

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

S. 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 Responses	Remark
1	Regulation 23(9) Non-compliance with disclosure of related party transactions on consolidated basis	Regulation 23(9) Non-compliance with disclosure of related party transactions on consolidated basis	Company did not make timely disclosure of the related party transactions as per regulation 23(9)	BSE Limited	Filing with SEBI	Regulation 23(9) delay of 2 days	11800	Late submission of the disclosure of related party transaction	There was a delay of 2 days in making disclosure to SEBI.	The company has taken corrective steps and paid penalty of Rs11,800/- through online mode on 10 <sup>th</sup> July 2023.

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ons on consolid ated basis		party transact ions as per regulati on 23(9)				on	SEBI.	paid penalty of Rs11,8 00/- throug h online mode on 10 <sup>th</sup> July 2023.
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1. I/we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

<u>Sr. No.</u>	<u>Particulars</u>	<u>Compliance Status</u> (Yes/No./NA)	<u>Observations/Remarks by PCS*</u>
1	<b>Secretarial Standards:</b> 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	
2	<b>Adoption and timely updation of the Policies:</b> • 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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	
3	<b>Maintenance and disclosures on Website:</b> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a	Yes	

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	provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee		
9	<b>Disclosure of events or information:</b> 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	
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 Observations 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	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		None of the Auditor resigned

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	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		
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	NA	
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	
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	Yes	

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13	Regulation 46(2)(za) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 disclosures relating to Employee Benefit Scheme documents under SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021, company has <b>not issued</b> any Employee Benefit Schemes.	NA	
14	<b>Additional non-compliances, if any:</b> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.		

## 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 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 Ayush Sinha & Associates**

**Company Secretaries**

  
Ayush Sinha  
Proprietor

ACS: 51207

COP No.: 18577

PR No.: 4555/2023

UDIN: A051207G000492637

DATE: 29/05/2025

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