

# TRICOM FRUIT PRODUCTS LIMITED

Registered Off: Gat No. 336, 338 to 341, Village Andhori, Taluka - Khandala, Dist. Satara - 415521,  
Maharashtra, Tel : +91-2169 266251 , URL: www.tricomfruitproducts.com  
CIN: L67120PN1995PLC139099

30.06.2021

To,  
Department of Corporate Services  
Bombay Stock Exchange Limited,  
P J Tower, Dalal Street,  
Mumbai-400001

Dear Sir,

**Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2021, under Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements), Regulation, 2015.**

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find attached the Annual Secretarial Compliance Report from Practicing Company Secretary for the year ended March 31, 2021. Kindly take this on record and acknowledge.

Thanking you,

Yours faithfully,

**For Tricom Fruit Products Limited**

  


**Chandrakant Joshi**  
Managing Director  
(DIN: 08398213)

# H V Gor & Co

## Company Secretaries

### Secretarial Compliance Report of Tricom Fruit Products Limited

For financial year ended 31<sup>st</sup> March, 2021

I, Mr. Harsh Gor, Company Secretary in whole time practice, have examined:

- a. All the documents and records made available to me and explanation provided by **TRICOM FRUIT PRODUCTS LIMITED** ("the listed entity") arising from the compliances of specific Regulations listed under Clause 2 of this report;
- b. the filings / submissions made by the Listed Entity to the stock exchanges in connection with the above;
- c. website of the listed entity;
- d. all other documents, filings, or submission on the basis of which this certification is given;

for the year ended 31<sup>st</sup> March, 2021 ("Review Period") in respect of the compliance with the following 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. 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 as the Listed Entity did not issue any securities 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 since the Listed Entity did not buy back any securities during the period under review**
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not applicable since the Listed Entity has not granted any Employee Stock Options during the period under review**
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable since the Listed Entity did not issue any debt securities during the period under review**
- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not applicable since the Company did not issue any nature of preference shares during the period under review.**

**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:-

<b>Sr No</b>	<b>Compliance Requirement (Regulations/ Circulars/ Guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
-	NA	NA	NA

- b. The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- c. The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

<b>Sr No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/ Remarks by Practicing Company Secretary</b>
-	NA	NA	NA	NA

- d. The listed entity has taken following measures to comply with the observations made in the previous reports:

<b>Sr No.</b>	<b>Observations/ Remarks by Practicing Company Secretary in the previous reports</b>	<b>Observations made in the Secretarial Compliance Report for the year ended-</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
-	NA	NA	NA	NA

**For H V GOR & CO  
Practicing Company Secretaries**

**Mr. Harsh V Gor  
(ACS: 38377, COP: 14269)  
Proprietor  
Date: June 25, 2021  
Place: Dombivli, Maharashtra  
UDIN: A038377C000513137**

**Note: This report of even date is to be read along with the declaration provided in Annexure A to this report**

**Annexure A to the Annual Secretarial Compliance Report**

**for the financial year ended 31<sup>st</sup> March, 2021**

1. Maintenance of record and registers is the responsibility of the management of the company and its authorized representatives and agencies. Our responsibility is to express an opinion on these records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the records. The verification was done on test basis to ensure that correct facts are reflected in records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of transfer and transmission of shares of the Company.
4. Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on test basis.
6. The Certificate is neither an assurance as to the future viability of the company or of the efficacy or effectiveness with which the management has conducted the affairs of the company.

**For H V GOR & CO**  
**Practicing Company Secretaries**

**Mr. Harsh V Gor**  
**(ACS: 38377, COP: 14269)**  
**Proprietor**  
**Date: June 25, 2021**  
**Place: Dombivli, Maharashtra**  
**UDIN: A038377C000513137**