

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

29.05.2019

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, 2019, 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 31,2019. Kindly take this on record and acknowledge.

Thanking you,

Yours faithfully,

For Tricom Fruit Products Limited


Chandrakant Joshi
Managing Director
(DIN: 08398213)





Sadashiv Kharmate & Associates

Practicing Company Secretaries

CS Sadashiv Kharmate
M.Com; FCS

Annual Secretarial Compliance Report of Tricom Fruit Products Limited for the year ended 31st March 2019

I, Sadashiv Kharmate, Proprietor of Sadashiv Kharmate & Associates, Practicing Company Secretaries, have examined:

(a) all the documents and records made available to us and explanation provided by **Tricom Fruit Products 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 31st March 2019 ("Review Period") in respect of compliance with the provisions of :

1) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder ; and

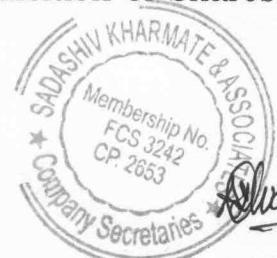
2) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India "SEBI" ;

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;

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) regulations, 2011;





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(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

(g) Securities and Exchange Board of India (Issue and Listing of Non - Convertible and Redeemable Preference Shares) Regulations, 2013;

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; 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, as applicable. However, it is observed that in the light of regulation 17 of SEBI (LODR) Regulations, 2015, three directors viz.

1. Mr. Chetan Kothari, (Executive Director)
2. Mrs. Chetana Kothari, (Woman non-executive director) and
3. Mr. Paresh Pathak, (Independent non-executive director) of the listed entity was found disqualified on verification of DIN of these directors as on the date of issuing this ASCR.

(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 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:





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Sr. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/remarks of the Practicing Company Secretary, if any.
1.	Bombay Stock Exchange	Regulation 34 of SEBI(LODR) Regulations, 2015 Non submission of Annual Report for FY 2017-18	Fine of Rs.37700/- as on 16 th November 2018 plus Rs.2000/- per day till the date of payment exclusive of GST @18%	The fine as imposed by Bombay Stock Exchange has not been paid so far.
2.	Bombay Stock Exchange	Regulation 14 of SEBI (LODR) Regulations, 2015 Nonpayment Annual Listing Fees for FY 2017-18 and FY 2018-19	Listing Fees 2,87,500/- for FY 2017-18 and Rs.2,95,000/- for FY 2018-19 along with interest of Rs. 23094/- as on 8 th February 2019	The listed entity has not paid Fees till the date of issue of Annual Secretarial Compliance Report.

Place: MUMBAI
Date: 28th May 2019



FOR SADASHIV KHARMATE & ASSOCIATES
COMPANY SECRETARIES


(S. T. KHARMATE)
PROPRIETOR
FCS 3242, CP 2653