+91 265 6700300
PHONE

Transpek Industry Limited
Reg. Office:
4th Floor, Lilleria 1038
Gotri - Sevasi Road
Vadodara - 390021. Gujarat, (India)

Date: 19th May, 2023

To,
BSE Limited
Listing Department,
P.J. Towers, Dalal Street,
Fort, Mumbai - 400 001

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2023

Dear Sir/Madam,

Pursuant to the provisions of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2023, issued by CS Vijay L. Vyas, Practicing Company Secretary on 18th May, 2023.

Kindly take the information on your record.

Thanking You,
Yours faithfully,
For Transpek Industry Limited

TRANSPEK INDUSTRY LIMITED * VADODARA *

Alak D. Vyas
Company Secretary &
Compliance Officer
Alak/Richa

Works:
At. & Post: Ekalbara
Taluka: Padra
Dist.: Vadodara - 391 440
Gujarat (India)
Ph.: +91-2662-244444, 244318, 244309
Fax: +91-2662-244439, 244207

www.transpek.com
WEBSITE
inquiry@transpek.com
EMAIL

Company Identification No.: L23205GJ1965PLC001343

VIJAY L. VYAS
Practising Company Secretary
51, 'Yashkamal', Sayajiganj, Vadodara – 390020.

18th May, 2023

To,
The Board of Directors,
TRANSPEK INDUSTRY LIMITED
CIN:- **L23205GJ1965PLC001343**
4th Floor, 1038 LILLERIA,
Gotri – Sevasi Road,
VADODARA - 390021

Sir/ Madam,

Annual Secretarial Compliance Report for the Financial Year 2022-23.

We have been engaged by **TRANSPEK INDUSTRY LIMITED** (hereinafter referred to as 'the Company') bearing **CIN:- L23205GJ1965PLC001343** whose equity shares are listed on BSE Limited (Security Code: 506687) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th 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 provisions of all 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.

CS VIJAY L VYAS
PROPRIETOR
FCS: 1602; COP No.: 13175; PRC: 1836
Unique Code No. I2014GJ1154300
UDIN: F001602E000331778

CS VIJAY L. VYAS
FCS-1602
CP-13175
VADODARA

+ 91 9979890115 csvlvyas@gmail.com
Residence: 'Shivam', 49, Parshuram Nagar Housing Society, Sayajiganj, Vadodara - 390020.

VIJAY L. VYAS
Practising Company Secretary
5108, 'Yashkamal', Sayajiganj, Vadodara – 390020.

SECRETARIAL COMPLIANCE REPORT

of

TRANSPEK INDUSTRY LIMITED

for the financial year ended 31st March, 2023

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by TRANSPEK INDUSTRY LIMITED (hereinafter referred as 'the listed entity'), having its Registered Office at 4th Floor, 1038 LILLERIA, Gotri-Sevasi Road, VADODARA 390021.

Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on my 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, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2023, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I, CS VIJAY L VYAS have examined:

(a) all the documents and records made available to us and explanation provided by TRANSPEK INDUSTRY 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, 2023 ("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 Securities and Exchange Board of India ("SEBI");

CS VIJAY L. VYAS FCS-1602 CP-13175 VADODARA

+ 91 9979890115 csvlvyas@gmail.com
Residence: 'Shivam', 49, Parshuram Nagar Housing Society, Sayajiganj, Vadodara - 390020.

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 there was no reportable event 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 as there was no reportable event during the review period;**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - **Not Applicable as there was no reportable event during the review period;**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not Applicable as there was no reportable event during the review period;**

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; - **Not Applicable as there was no reportable event during the review period;**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

I hereby report that, during the Review Period –

(a) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my examination of those records.

(b) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.

(c) The listed entity has taken the following actions to comply with the observations made in previous reports - **Not Applicable**.

(d) The listed entity has complied with the provisions of Para 6 of Circular No. CIR/ CFD/ CMD1/114/2019 issued by SEBI on 18th October, 2019 in terms of appointment of Statutory Auditors of Listed Entity as stated in **Annexure - A** to the report.

(e) Our affirmations, as required, in terms of the BSE Circular No: 20230316-14 dated March 16,2023 and amendments therein, are appended below.

CS VIJAY L. VYAS FCS-1602 CP-13175 VADODARA

The compliance status of the listed entity is as follows:-

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /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 India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	YES	
2.	**Adoption and timely updation of the Policies:** • 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	
3.	**Maintenance and disclosures on Website:** • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a 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	YES YES YES	

CS VIJAY L. VYAS FCS-1602 CP-13175 VADODARA

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
4.	**Disqualification of Director:** None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmedby the listed entity.	YES	
5.	**Details related to Subsidiaries of listed entities havebeen examined w.r.t.:** (a)Identification of material subsidiary companies (b)Disclosure requirement of material as well as other subsidiaries	N.A. YES	The Company does not have any Material Subsidiary.
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 Documentsand Archival policy prescribed under SEBI LODR Regulations, 2015.	YES	
7.	**Performance Evaluation:** The listed entity has conducted performance evaluation of the Board, Independent Directors, and the Committeesat the start of every financial year/during the financial year as prescribed in SEBI Regulations.	YES	
8.	**Related Party Transactions:** (a)The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b)The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	YES YES	

VIJAY L. VYAS FCS-1602 CP-13175 VADODARA

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
9.	**Disclosure of events or information:** 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.	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** 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 except as provided under separate paragraph herein (**).	YES	
12.	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	YES	

CS VIJAY L. VYAS
FCS-1602
CP-13175
VADODARA

ANNEXURE – A

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as perSEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	**Compliances with the following conditions while appointing/re-appointing an auditor**		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	N.A.	The Auditors have not resigned.
	ii. If the auditor has resigned after 45 days from theend of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	N.A.	
	iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the auditreport for such financial year.	N.A.	
2.	**Other conditions relating to resignation of statutory auditor**		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:	N.A.	The Auditors have not reported any concerns.
	a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit	N.A.	

CS VIJAY L. VYAS FCS-1602 CP-13175 VADODARA

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks by PCS*
	Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.		
	b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.	N.A.	The Auditors have not proposed to resign
	c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.	N.A.	
	ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	N.A.	The auditors have not reported any non- receipt of information.
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/ CMD1/114/2019 dated 18th October, 2019.	N.A.	The Auditors have neither resigned nor proposed to resign.

CS VIJAY L. VYAS FCS-1602 CP-13175 VADODARA

(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/ CircularNo.	Deviations	ActionTaken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Submission of the financial results & Limited Review Reports within 30 minutes of conclusion of Board Meeting.	Regulation 33 of SEBI (LODR) Regulations, 2015.	Late submission.	BSE Ltd.,	Fine	Late submission of Auditors Limited Review Report of September 2022 quarter Standalone Financial Results.	Rs. 50000	The Auditors Limited Review Report on Standalone Financial Results of September, 2022 quarter was left out while uploading the Financial Results on 09-11-2022. It was then submitted on 24-11-2022.	It was inadvertently left out to be uploaded in hurry to comply within 30 minutes. Fine Paid. Matter put up to Board and Board response submitted to BSE Ltd.,	The Company has paid the fine on 21st December, 2022.

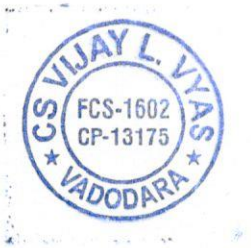
(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines includingspecific clause)	Regulation/ Circular No.	Deviations	ActionTaken by	Type of Action	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Submission of the voting results within a period of two working days of the conclusion of the General Meeting as provided under SEBI (LODR) Regulations, 2015.	Regulation 44(3)	Voting Results submitted on the third day instead of within two working days of the conclusion	BSE Ltd.,	Fine	Submission of Voting Results of Postal Ballot on third Working Day instead of within two working days.	Rs.10000/-	The Company submitted the Voting Results of the Postal Ballot on the third working day of conclusion of the Postal Ballot.	SEBI LODR Regulations do not mention voting by postal ballot and the voting results of postal ballot were submitted within 7 days as per section 110 of the Companies Act, 2013 and Rule 22 of the Companies (Mgmt & Admn) Rules, 2014.	The Company has paid the fine on 16th December, 2021.

CS VIJAY L. VYA FCS-1602 VADODARA

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 certify 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 Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as tothe future viability of the listed entity nor of the efficacy or effectiveness with which the management hasconducted the affairs of the listed entity.



CS VIJAY L VYAS
Practicing Company Secretary
FCS No. 1602: CP No. 13175:
PRC No.: 1836
Unique Code No. I2014GJ1154300
UDIN: F001602E000331778

Place: VADODARA
Date: 18TH MAY, 2023