

TRIOCHEM PRODUCTS LIMITED

Registered Office: 4th Floor, Sambava Chambers, Sir. P. M. Road, Fort, Mumbai,
Maharashtra, PIN: 400001. Telephone: +91 (22) 2266 3150 Fax: +91 (22) 2282 8181
E-mail: info@amphray.com Website: www.triochemproducts.com
Corporate Identity Number: L24249MH1972PLC015544



Ref No: TPL PP 20230362 2023; 3rd June 2023

To
Listing Compliance Monitoring Team
BSE Limited, Mumbai

Ref: Email dated 1st June 2023

Subject: Non-submission of Related Party Transaction in XBRL Mode under Re. 23(9)
for the period ended March 31, 2023

Security Code No.: 512101 – ISIN No.: INE 331 E 01013

Respected Sir/Madam,

With reference to your email dated 1st June 2023 regarding the non-submission of related party transaction in XBRL Mode under Regulation 23(9) for the period ended March 31, 2023, we would like to submit that:

1. Disclosure of the Related Party Transaction on a consolidated basis under Regulation 23(9) of SEBI (Listing Obligation and Disclosure Requirement) (Amendment) Regulations, 2018, is not applicable to our Company and the Certificate of Non-applicability of 23(9) of SEBI (Listing Obligation and Disclosure Requirement) (Amendment) Regulations, 2018, has already been submitted on 29th May 2023 vide BSE Acknowledgement Number 5636732 as enclosed below.
2. There are no options available in XBRL for non-applicability of Related Party Transactions.
3. As per Regulation 15(2) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015, the compliance with corporate governance provisions as specified in regulations 17, [17A,] 18, 19, 20, 21, 22, 23, 24, [24A,] 25, 26, 27 and clauses (b) to (i) [and (t)] of sub-regulation (2) of regulation 46 and para C, D and E of Schedule V shall not apply, in respect of – listed entity having paid up equity share capital not exceeding rupees ten crore and net worth not exceeding rupees twenty-five crore, as on the last day of the previous financial year. The paid-up equity share capital of Company is Rs.

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24,50,000/- which is less than Rs 10 crores and net worth is Rs.11,59,72,143/- which is less than Rs 25 crores as per the audited Balance Sheet as at 31st March, 2023, which is within the limit as prescribed in Regulation 15(2) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015.

4. The provision relating to disclosure of the Related Party Transaction on a consolidated basis under Regulation 23(9) of SEBI (Listing Obligation and Disclosure Requirement) (Amendment) Regulations, 2018, is **not applicable** to our Company since the provisions of Corporate Governance as mentioned in above point (3) is not applicable to our Company.
5. Also, as per the Guidance Note on disclosure of Related Party Transactions issued by BSE vide Notice No. 20220425-30 Dated 25-Apr-2022, the compliance with the provisions of 23 shall not apply, in respect of listed entity having paid up equity share capital not exceeding Rs 10 crore and net worth not exceeding Rs 25 crores. Since the paid-up equity share capital of Company is Rs. 24,50,000/- and net worth is Rs. 11,59,72,143/- as per the audited Balance Sheet as at 31st March, 2023, the Company is not required to submit the Related Party transaction disclosure under Regulation 23(9) of SEBI (Listing Obligation and Disclosure Requirement) (Amendment) Regulations, 2018.

We request you to take the above clarification on record.

Thanking you,

Yours faithfully,

For TRIOCHEM PRODUCTS LIMITED

RAMU S. DEORA

DIRECTOR

DIN: 00312369

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Ref No: TPL PP 20230359 2023; 29th May 2023

To
BSE Limited
Corporate Relationship Department,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort, Mumbai: 400 001.
Security Code No. 512101 - ISIN No.: INE331E01013.

Dear Sir / Madam,

Sub: Non-Applicability of Regulation 23(9) of SEBI (LODR) (Amendments) Regulation, 2018

This is to inform you that Disclosures of the Related Party Transaction on a consolidated basis under Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018 is not applicable to our Company.

Further, we would like to clarify that our claiming exemption under Regulation 15(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the compliance with the Corporate Governance provision shall not apply to listed entities having Paid up equity share capital not exceeding Rs.10 Crores and Net worth not exceeding Rs.25 Crores, as on last day of previous financial year. This is to certify that the, paid up equity capital of the company is Rs.24,50,000/- (Rs. Twenty-Four Lakh Fifty Thousand Only) which is less than Rs.10 Crores (Rs. Ten Crores) and Net worth is Rs.11,59,72,143/- (Rs. Eleven Crores Fifty-Nine Lakh Seventy-Two Thousand One Hundred Forty Three Only) which is less than Rs.25 Crores. (Rs. Twenty-Five Crores) as per the audited Balance sheet as at 31st March 2023, which is within the limit as prescribed in Regulation 15(2) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015.

This Certificate is issued pursuant to requirement of declaration of applicability of Regulation 15(2) of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

In view of above, the Company is exempted under Regulation 15(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and consequently the company is also exempted from submitting the Disclosures of the Related Party Transaction on a consolidated basis for the Half Year Ended 31st March 2023 to the Stock Exchange.

Further, we confirm that where the provision of the said regulation becomes applicable to the Company at a later date, the same shall be complied with, within six months from the date on which the provisions become applicable to the Company.

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You are requested to take the above information in your records.

Thanking you,

Yours faithfully,

For **TRIOCHEM PRODUCTS LIMITED**

RAMU SITARAM
DEORA

Digitally signed by RAMU
SITARAM DEORA
Date: 2023.05.29 19:15:02
+05'30'

RAMU S. DEORA

DIRECTOR

DIN: 00312369

Date & Time of Download : 29/05/2023 19:27:23

BSE ACKNOWLEDGEMENT

Acknowledgement Number	5636732
Date and Time of Submission	5/29/2023 7:26:29 PM
Scripcode and Company Name	512101 - TRIOCHEM PRODUCTS LTD.
Subject / Compliance Regulation	Non-Applicability Of Regulation 23(9) Of SEBI (LODR) (Amendments) Regulation, 2018
Submitted By	Puran Jaykisan Parmar
Designation	Designated Officer for Filing

Disclaimer : - Contents of filings has not been verified at the time of submission.