

May 30, 2025

To
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai- 400 001
Scrip Code: 512038

Sub.: Annual Secretarial Compliance Report.

Dear Sir/ Ma'am,

Pursuant to provisions of Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose the Annual Secretarial Compliance Report dated 24 May, 2025, for the Financial Year ended March 31, 2025, certified by M/s Sachapara & Associates, Company Secretaries.

Kindly take the same on records.

Thanking You,
For TCC Concept Limited

Umesh Kumar Sahay
Managing Director
DIN: 01733060

Encl: As above.

TCC Concept Limited

(Formerly known as Aaswa Trading and Exports Limited)

Regd. Office: 5th Floor, VB Capitol Building, Range Hill Road, Opp. Hotel Symphony, Bhoslenagar, Shivajinagar,
Pune-411007 | CIN: L68200PN1984PLC222140 | Tel.: 020 2952 0104
Email Id: compliance@tccltd.in | Website: www.tccltd.in

To,

The Board of Directors

TCC CONCEPT LIMITED

5th Floor, VB Capitol Building, Range Hill Road,
Opp. Hotel Symphony, Bhoslenagar, Shivajinagar,
Aundh, Pune, Haveli, Maharashtra, India, 411007

Dear Sir(s),

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

I have been engaged by TCC CONCEPT LIMITED (hereinafter referred to as the Company) bearing CIN: L68200PN1984PLC222140 whose Equity Shares are listed on BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 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.

My 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.

My 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.

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Annual Secretarial Compliance Report is enclosed.

For Sachapara & Associates
Company Secretaries

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CHIRAG SACHAPARA
Date: 2025.05.24
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Chirag Sachapara

Proprietor

M No.: F13160C P No.: 22177

PR No. 3447/2023

UDIN: F013160G000431226

Place: Mumbai

Date: May 24, 2025

**Secretarial Compliance Report of TCC CONCEPT LIMITED
for the financial year ended 31st March, 2025**

I have examined:

- (a) all the documents and records made available to me and explanation provided by **TCC CONCEPT 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, 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, circulars, guidelines issued thereunder; and
 - ii. 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 and amendments from time to time;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 and amendments from time to time;
- (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 to the company during the review period)

- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable to the company during the review period).
- (f) Securities and Exchange Board of India Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable to the company during the review period)
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;
- (h) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018 and circulars/issued thereunder;
- (i) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the company during the review period)

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:

Sr. 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 Response	Remarks
1.	Clause 4 of Schedule B read with Regulation	Clause 4 of Schedule	Intimation of closure of trading	PCS	Advisory	Intimation of closure of trading	-	The company has given intimation for closure of trading window for the	The Company would like to clarify that the intimation for closure of the trading	Advised management to take

	9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.	B read with Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.	window for Quarter ended on 30.09.2024 is given in XBRL format on BSE portal but not given in PDF format.			window for Quarter ended on 30.09.2024 is given in XBRL format on BSE portal but not given in PDF format.		quarter ended 30.09.2024 in XBRL format within the specified timeline to BSE Limited and which is available in public domain but inadvertently missed to given the same in pdf format.	window for the quarter ended 30th September, 2024 was duly submitted to BSE Limited in XBRL format within the prescribed timeline and is available in the public domain. However, we acknowledge that the corresponding intimation in PDF format was inadvertently not filed. The Company remains committed to maintaining high standards of compliance and will ensure that such oversight does not recur in the future.	due care in future.
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports: NA

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	NA	NA	NA	NA	NA	NA

I hereby report that, during the Review Period the compliance status of the listed entity with the following requirements:

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	-

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4.	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	-
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes	-
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 Documents and 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 Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	-

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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 the LODR Regulations by listed entities.	NA	There was no resignation of statutory auditors from the Company or its material subsidiary.
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc.	No	No non-compliance found during the review period except as mentioned in Clause (a), (Page No. 4 and 5 of this Report).

*Observations /Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA.'

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 Sachapara & Associates
Company Secretaries

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Chirag Sachapara

Proprietor

M. No.: F13160 & C P No.: 22177

PR No. 3447/2023

UDIN: F013160G000431226

Dated this May 24, 2025 at Mumbai.