

Ref No: TSLL/13/2025-2026

Date: 29th May 2025

Department of Corporate Services BSE Limited Corporate Relations Department Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001.	Listing Compliance National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051
BSE Scrip Code: 520151	NSE Symbol: TRANSWORLD

Dear Sir/Madam,

Subject: Compliance under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Pursuant to Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find the attached Secretarial Compliance Report duly issued by Mr. Vicky M. Kundaliya of M/s. V.M. Kundaliya & Associates, Practicing Company Secretary for the financial year ended 31st March 2025.

The above information is also being made available on the Company's website at <https://www.transworld.com/transworld-shipping-lines/disclosure-under-regulation-46-of-lodr/secretarial-compliance-report/>

Kindly take the same on record and acknowledge receipt.

Thanking you,

Yours truly,
For **Transworld Shipping Lines Limited**
(formerly known as **Shreyas Shipping and Logistics Limited**)

Namrata Malushte
Company Secretary & Compliance Officer

Encl: as above



V. M. KUNDALIYA & ASSOCIATES

COMPANY SECRETARIES

To,
Transworld Shipping Lines Limited
(Formerly known as "Shreyas Shipping and Logistics Limited")
D-301 to 305, Level 3, Tower 3, Tower II,
Seawoods, Grand Central, Plot No R1, Nerul Node,
Navi Mumbai- 400 706

Secretarial Compliance Report of Transworld Shipping Lines Limited (Formerly known as "Shreyas Shipping and Logistics Limited") for the financial year ended 31st March, 2025

We V. M. Kundaliya & Associates, Company Secretaries have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Transworld Shipping Lines Limited (Formerly known as "Shreyas Shipping and Logistics Limited")** (hereinafter referred as 'the listed entity'), having its Registered Office at D-301 to 305, Level 3, Tower 3, Tower II, Seawoods, Grand Central, Plot no R1, Nerul Node, Navi Mumbai- 400 706. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

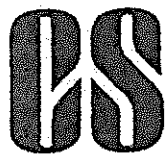
Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2025 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We V. M. Kundaliya & Associates, Company Secretaries have examined:

- a) all the documents and records made available to us and explanation provided by 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 Report,

for the **Financial Year ended 31st March, 2025** ("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 SEBI;



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The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- a) The Securities and Exchange Board of India (LODR) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable during the Review Period);**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**(Not Applicable during the Review Period);**
- d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; **(Not Applicable during the Review Period);**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable during the Review Period);**
- f) Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021; **(Not Applicable during the Review Period);**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- j) Securities And Exchange Board Of India (Delisting Of Equity Shares) Regulations, 2021**(Not Applicable during the Review Period);**

and circulars/ guidelines issued thereunder;

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 the matters specified below:-



V. M. KUNDALIYA & ASSOCIATES

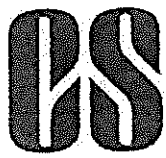
COMPANY SECRETARIES

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

Sr. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended (The years are to be mentioned)	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
Not Applicable						

I. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:-

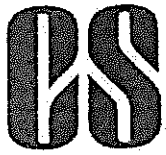
Sr. No	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	None
2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"> • All the applicable policies under SEBI regulation are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with the SEBI Regulations and have been reviewed & timely updated on time as per the regulations/circulars /guideline issued by SEBI. 	Yes Yes	None
3.	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none"> • 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 redirects to the relevant document(s)/ section of the website 	Yes Yes Yes	None



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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 Practising Company Secretary	Management Response	Remarks
1	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015	Regulation 23(9)	The Company submitted the disclosure of Related Party Transactions subsequent to the publication of its Financial Results for the half year ended 31 st March 2024.	BSE Limited and National Stock Exchange of India Limited	Fine	The Company submitted disclosure of Related Party Transactions on 24 th May, 2024, following the publication of its Financial Results in PDF on 23 rd May, 2024 for the half year ended 31 st March 2024.	BSE Limited: Rs. 5900/- NSE:- Rs. 5900/-	The Company has paid Fine.	While there was a delay of a few hours in submission of the Related Party disclosure, the said disclosure was however filed within 24 hours from the conclusion of the Board meeting. The Company has paid fine of Rs.5900/- (including GST @18%) as levied by each Exchange.	-
2	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015	Regulation 21(3C)	The Company has conducted two consecutive Meetings of the Risk Management Committee outside the time limit specified under the Regulations.	Securities and Exchange Board of India	Administrative Warning	The Company has conducted two consecutive meetings of the Risk Management Committee with a time gap of 483 days.	-	-	The Company undertakes to comply with the provisions of the Regulation 21(3C) of SEBI (Listing Obligations and Disclosure Requirements), 2015 and shall ensure going forward that the gap between two Risk Management Committee meetings doesn't exceed 210 days as per the amended provision of Regulation 21(3C) of SEBI (Listing Obligations and Disclosure Requirements), 2015.	-



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4.	<u>Disqualification of Director:</u> None of the Director of the listed entity are disqualified under Section 164 of Companies Act, 2013 as confirmed by the Listed Entity	Yes	None
5.	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NA Yes	The Company does not have material subsidiary company and hence identification is not required. None
6.	<u>Preservation of Documents:</u> 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	None
7.	<u>Performance Evaluation:</u> 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	None
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified /rejected by the Audit Committee	Yes NA	None All necessary approvals are in place.



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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	No	As mentioned Below in Note 1 below
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	None
11.	Actions taken by SEBI or Stock Exchange(s), if any: The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	No	As mentioned Below in Note 2 below
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	The Statutory Auditors of the Listed entity has not resigned, and hence compliance of Chapter V of Master Circular is not applicable. Also the Company does not have material subsidiary and hence compliance is not applicable.
13.	Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	Yes	None



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Note 1:-

1. The Company has not reported as per sub-para 20 of Para A of Part A of Schedule III read with Regulation 30 of SEBI LODR with respect to fine imposed under Regulation 23(9) by the Stock Exchanges, within the prescribed time and format as the Company was of the view that the amount of fine was not material.
2. In three instances, the Company filed disclosures under Regulation 30 of the SEBI LODR with a delay and duly provided justifications for the same within those disclosures.

Note 2:-

1. The Company has delayed compliance under Regulation 23(9) of SEBI LODR with respect to disclosure of Related Party Transactions for the half-year ended 31st March 2024. Consequently, BSE Limited and National Stock Exchange of India Limited levied a fine of ₹5,900 (inclusive of GST) each on 28th June 2024, which has been duly paid by the Company on 4th July, 2024.
2. The Company received an Administrative Warning Letter pursuant to the Non-compliance of provisions of Regulation 21(3C) of SEBI LODR pertaining to gap between two consecutive Risk Management Committee meetings exceeding 180 days.

I further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. - **Not Applicable during the Review Period.**

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 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 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 V. M. Kundaliya & Associates
Company Secretaries

VICKY
MADHAVDAS
KUNDALIYA

Digitally signed by VICKY
MADHAVDAS KUNDALIYA
Date: 2025.05.26 19:14:50
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Vicky M. Kundaliya
Proprietor

FCS-7716/C. P. No. 10989

Peer Review Certificate No. 1245/2021

UDIN: F007716G000440170

ICSI Unique Code: S2012MH183100

Place: Mumbai

Date: 26th May, 2025