

# SEACOAST SHIPPING SERVICES LIMITED

CIN: L61100GJ1982PLC105654

Regd. Office: D-1202, Swati Crimson and Clover, Shilaj Circle, Sardar Patel  
Ring Road, Ahmedabad – 380 054

Email: [mahaanimpex@gmail.com](mailto:mahaanimpex@gmail.com), Website: [www.seacoastltd.com](http://www.seacoastltd.com)

Tel. No: +91-9904884444

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Date: 3<sup>rd</sup> June, 2024

To,  
**BSE Limited**  
Phiroze Jeejeebhoy Tower,  
Dalal Street,  
Mumbai – 400 001  
Scrip Code: 542753

To,  
**The Calcutta Stock Exchange Limited**  
7, Lyons Range, Dalhousie,  
Kolkata – 700 001, West Bengal  
Scrip Code: 023490

Dear Sir/ Madam,

**Sub: Revised Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended on 31<sup>st</sup> March, 2024**

**Ref: Security Id: SEACOAST/ Code: 542753**

With reference to the captioned subject, kindly find attached herewith revised Annual Secretarial Compliance Report issued under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 for the year ended on 31<sup>st</sup> March, 2024.

Please take note of the same on your records.

Thanking You.

**For, Seacoast Shipping Services Limited**

**Manishkumar Shah**  
**Managing Director**  
**DIN: 01936791**



## SECRETARIAL COMPLIANCE REPORT OF SEA COAST SHIPPING SERVICES LIMITED FOR THE YEAR ENDED MARCH 31, 2024

We, Jay Pandya & Associates, Company Secretaries, Ahmedabad have examined:

- (a) all the documents and records made available to us and explanation provided by **Sea Coast Shipping Services 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 report, for the year ended **March 31, 2024** ("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;
- (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;
- (d) Securities and Exchange Board of India (Buyback 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 Debt Securities) Regulations, 2008; **Not Applicable during the review period**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable during the review period**





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- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

and based on the above examination, We 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	Action Taken By	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Non-compliance w.r.t the dissemination of information on Outcome of AGM	Regulation 30 of SEBI LODR	Late Filing	--	--	--	--	The dissemination of Information as per the Regulation 30 of SEBI LODR was filed on 4 <sup>th</sup> November, 2023	Company has ensure that the same shall be complied with in the near future.	--
2	Non-compliance w.r.t the dissemination of information on Scrutinizer's report of AGM	Regulation 44 of SEBI LODR	Late Filing	--	--	--	--	The dissemination of Information as per the Regulation 44 of SEBI LODR was filed on 4 <sup>th</sup> November, 2023	Company has ensure that the same shall be complied with in the near future.	--
3	Compliance w.r.t the dissemination of information on outcome and financial results	Regulation 30 and 33 of SEBI LODR	Non-compliance w.r.t the dissemination of information on outcome and financial results within Prescribed time	BSE	Fine	Delayed Submission for the Quarter of December 2023	33040	The BSE has imposed Fine for the Violation of mentioned regulation.	Company has ensure that the same shall be complied with in the near future.	--
4	Compliance with submission of secretarial	Regulation 24A	Non-compliance with submission of	BSE	Fine	Delayed Submission of	30680	The BSE has Imposed Fine for the Violation of	--	--



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	compliance report		secretarial compliance report			secretarial compliance report		mentioned regulation		
5	Submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances	Regulation 13(3)	Non-submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances	BSE	Fine	Delayed Submission for Quarter September, 2023	15340	The BSE has imposed Fine for the Violation of mentioned regulation	--	--
6	Compliance with the constitution of nomination and remuneration committee	Regulation 19(1)/19(2)	Non-compliance with the constitution of nomination and remuneration committee	BSE	Fine	Non-compliance with the constitution of nomination and remuneration committee For the quarter ended September 2023	21240	The BSE has imposed Fine for the Violation of mentioned regulation	--	--
7	Submission of the Corporate governance compliance report within the period provided under the regulation	Regulation 27(2)	Non-Submission of the Corporate governance compliance report within the period provided under the regulation	BSE	Fine	Delayed Submission for Quarter September, 2023	35400	The BSE has imposed Fine for the Violation of mentioned regulation	--	--



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8	Compliance with requirements to appoint a qualified company secretary as the compliance officer	Regulation 6(1)	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer	BSE	Fine	Non-compliance with requirement to appoint a qualified company secretary as the compliance officer for Quarter Ended December 2023	36850	The BSE has imposed Fine for the Violation of mentioned regulation	--	--
9	Compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	Regulation 17(1)	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	BSE	Fine	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director for the Quarter Ended December 2023	283200	The BSE has imposed Fine for the Violation of mentioned regulation	--	--
10	Compliance with the constitution of nomination and remuneration committee	Regulation 19(1)/19(2)	Non-compliance with the constitution of nomination and remuneration committee	BSE	Fine	Delayed Submission for the Quarter Ended 2023	167560	The BSE has imposed Fine for the Violation of mentioned regulation	--	--
11	Submission of the financial results within the	Regulation 33	Non-submission of the financial results	BSE	Fine	Delayed Submission for the	247800	The BSE has imposed Fine for the Violation of	--	--



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	period prescribed under this regulation		within the period prescribed under this regulation			Quarter Ended 2023		mentioned regulation		
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(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 including specific clause)	Regulation/Circular No.	Deviations Action	Action Taken By	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	The Board of Directors shall have an optimum combinations of executive & Non-executive directors with atleast one-women director & not less than fifty percent of the board of directors shall comprise of non-executive directors	17(1) of SEBI LODR Regulation	The Company does not have optimum strength of Board of Directors till 02-06-2022 as per 17(1) of SEBI LODR	BSE	Fine	Non-compliance of Reg. 17(1) of SEBI LODR	45000	The BSE has imposed Fine for the Violation of mentioned regulation and the same is paid by the company.	The Company Appointed Independent Directors Mr. Apurv Kumar Patel & Mr. Jaydeep Bakul Shah on 02.06.2022	--
2	Every listed company shall constitute a qualified and independent audit committee in accordance with reg.	18(1)	The Company does not have a minimum number of Independent Directors till 02-06-2022 as per 18(1) of SEBI LODR	BSE	Fine	Non-compliance of Reg. 18(1) of SEBI LODR	12400	The BSE has imposed Fine for the Violation of mentioned regulation and the same is paid by the company.	The Company Appointed Independent Directors Mr. Apurv Kumar Patel & Mr. Jaydeep Bakul Shah on 02.06.2022	--
3	The Board of Directors shall	19(1) & 19(2)	The Company does	BSE	Fine	Non-compliance of	12400	The BSE has imposed Fine for the	The Company Appointed	



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	constitute a Nomination & Remuneration Committee in accordance with Reg. 19		not have a minimum number of Independent Directors till 02-06-2022 as per 19(1) & 19(2) of SEBI LODR			Reg. 19(1) & 19(2) of SEBI LODR		Violation of mentioned regulation and the same is paid by the company.	Independent Directors Mr. Apurv Kumar Patel & Mr. Jaydeep Bakul Shah on 02.06.2022	
4	The Listed Entity has to appoint a full time CFO of the Company	17	The Company has not appointed any CFO till 02.06.2022	--	--	--	--	--	The Company has appointed CFO Mr. Dhruvalkumar natubhai Patel as on 02.06.2022	
5	The listed entity shall submit to the SE a statement showing holding of securities and SHP separately for each class of shareholders on a quarterly basis within 21 days of the end of the quarter	31	The company has not submitted to the Stock exchange the SHP within the prescribed time limited	BSE	Fine	Non-compliance of Reg. 31 of SEBI LODR	108000	The BSE has imposed Fine for the Violation of mentioned regulation and the same is paid by the company.	The company has Submitted the Share holding pattern as on 13-09-2022	
6	The listed entity shall give at least five clear days prior intimation to Stock Exchange about the meeting of the board of directors in which the financial results is due to be considered	29	The Company delayed in furnishing the prior intimation to the stockexchange about the meeting of the board of directors	--	--	--	--	--	The company gave a two days clear notice instead of five clear days.	



I. We hereby report that during the review period the compliance status of the listed entity with the following requirement:

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1	<b>Secretarial Standards:</b>  The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	Yes	-
2	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations /circulars/guidelines issued by SEBI</li></ul>	Yes  Yes	-  -
3	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website</li><li>Timely dissemination of the documents/ information under a separate section on the website</li><li>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</li></ul>	Yes  Yes  Yes	-  -  -
4	<b>Disqualification of Director:</b>		







	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	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b>  (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NA  NA	-  -
6	<b>Preservation of Documents:</b>  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	<b>Performance Evaluation:</b>  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	-
8	<b>Related Party Transactions:</b>  (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/rejecte	NO  NA	No Information w.r.t Related party Transactions provided by Company.  -





	d by the Audit Committee, in case no prior approval has been obtained.		
9	<b>Disclosure of events or information:</b>  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	-
10	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  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.	Action Initiated	Sebi had Issued a Summons against the Company and its director(s) to appear in-person before the investigating authority (Under Section 11C (5) of SEBI Act, 1992) for which the Investigation is still ongoing as on the date of Signing this report.
12	<b>Resignation of statutory auditor from the listed entity or its material subsidiaries:</b>  In case of statutory auditor from the listed entity or its material subsidiaries during the financial year, the listed entity and/or its material subsidiaries has/have complied with paragraph 6.1 and 6.2 of section V-D of V of master circular on compliance with the provisions of LODR Regulations by listed entities.	NA	





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13	<b>Additional non-compliances, if any:</b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	No additional non-compliance was observed for any SEBI regulation / circular / guidance note etc. during the year under review.
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Assumptions and limitations of scope and review:

1. compliance of applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of 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 purpose of compliance in terms regulation 24A of the SEBI (LODR) Regulation, 2015 and 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, JAY PANDYA & ASSOCIATES,  
COMPANY SECRETARIES**



**JAY D. PANDYA**  
PROPREITOR  
ACS No.: 63213  
COP No.: 24319  
FRN: S2024GJ963300  
PR No.: 5532/2024  
UDIN: A063213F000497801  
Date: 30/05/2024  
Place: Ahmedabad