#### **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, Website: www.seacoastltd.com

**Tel. No:** +91-9904884444

**Date:** 30th May, 2024

To, **BSE Limited** 

Phiroze Jeejeebhoy Tower,

Dalal Street, Mumbai – 400 001

Scrip Code: 542753

Dear Sir/ Madam,

To,

The Calcutta Stock Exchange Limited

7, Lyons Range, Dalhousie, Kolkata – 700 001, West Bengal

Scrip Code: 023490

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

Ref: Security Id: SEACOAST/ Code: 542753

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

Please take note of the same on your records.

Thanking You.

For, Seacoast Shipping Services Limited

Manishkumar Shah Managing Director DIN: 01936791

# PS

#### JAY PANDYA & ASSOCIATES

COMPANY SECRETARIES

UID: S2024GJ963300 | Peer Review No.: 5532/2024

## 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 <u>March 31, 2024</u> ("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
- 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 Securities) Regulations, 2008; Not Applicable during the period
- (g) Securities and Exchange Board of India (Issue and Listing Convertible Securities) Regulations, 2021; Not Applicable during the review period

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- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- 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 N o.	Complianc e Requireme nt (Regulatio ns/ circulars/ guidelines including specific clause)	Regulatio n/ Circular No.	Deviatio ns Action	Actio n Take n By	Type of Actio n	Details of Violati on	Fine Amou nt	Observatio ns/ Remarks of the Practicing Company Secretary	Manageme nt Response	Rema rks
1	Non- complianc e w.r.t the disseminat ion of informatio n on Outcome of AGM	Regulatio n 30 of SEBI LODR				44		The disseminat ion of Informatio n as per the Regulation 30 of SEBI LODR was filed on 4th November, 2023	Company has ensure that the same shall be complied with in the near future.	-
2	Non- complianc e w.r.t the disseminat ion of informatio n on Scrutinizer 's report of AGM	Regulatio n 44 of SEBI LODR		***	70.3			The disseminat ion of Informatio n as per the Regulation 44 of SEBI LODR was filed on 4th November, 2023	Company has ensure that the same shall be complied with in the near future.	
3	Non- complianc e w.r.t the disseminat ion of informatio n on Intimation for Results	Regulatio n 29 of SEBI LODR	-	**	-			The disseminat ion of Informatio n as per the Regulation 29 of SEBI LODR have been done on 20th March, 2024 by the company in quarter 4 of 2023-24	Company has ensure that the same shall be complied with in the near future.	COMPANY COMPANY



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

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

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1	Secretarial Standards:  The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	Yes	
2	Adoption and timely updation of the Policies:		
	<ul> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed</li> </ul>	Yes	+
	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	Yes	-
	website  Timely dissemination of the documents/ information under a	Yes	CP. 24319 MN. 63213 UC 5202461963300
	separate section on the website  Web-links provided in annual corporate governance reports under	Yes	Secret



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200	Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website		
4	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	NA	-
	(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	AVB & A
7	Performance Evaluation:		25 CP. 24319
	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	MN. 6321. UC S2024619633
8	Related Party Transactions:		
	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	NO	No Information w.r.t Related party Transactions provided by Company.



**COMPANY SECRETARIES** 

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	(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejecte d by the Audit Committee, in case no prior approval has been obtained.	NA	
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	; <b>-</b> 3
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.	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 the Investigation is still ongoing as on the date of Signing this report.
12	Resignation of statutory auditor from the listed entity or its material subsidiaries:  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		CP. 24 MN. 6: UC\$20246



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	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.		(4-
13	Additional non-compliances, if any:  No additional non-compliance observed for any SEBI	Yes	No additional non- compliance was observed for any
	regulation/circular/guidance note etc.		SEBI regulation / circular / guidance note etc. during the year under review.

#### 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
- 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

ACS No.: 63213 COP No.: 24319

PROPREITO

FRN: S2024GJ963300 PR No.: 5532/2024

UDIN: A063213F000497801

Date: 30/05/2023 Place: Ahmedabad