

MAHARASHTRA SEAMLESS LIMITED

INTERIM CORPORATE OFFICE: Plot No.106, Institutional Sector-44, Gurgaon-122 002 Haryana (India)

Phone No.: 91-124-4624000, 2574326, 2574325, 2574728 • Fax: 91-124-2574327

E-mail: contact@mahaseam.com Website: www.jindal.com

CIN No: L99999MH1988PLC080545

CORPORATE OFFICE: Plot No. 30, Institutional Sector-44, Gurgaon-122 002 Haryana (India)

E-Communication

MSL/SEC/SE/2021-22

June 12, 2021

BSE Limited

25th Floor, P.J. Towers, Dalal Street, Mumbai-400001 National Stock Exchange of India Limited

Exchange Plaza, C-1, Block-G, Bandra - Kurla Complex Bandra (E), Mumbai-400051

Stock Code: 500265

Stock Code: MAHSEAMLES

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMDI/27/2019 dated 8th February, 2019, please find enclosed herewith the Annual Secretarial Compliance Report for the year ended March 31, 2021.

Submitted for your information and record.

Thanking you,

Yours faithfully,

For Maharashtra Seamless Limited

Ram Ji Nigam Company Secretary

Encl. As stated above



REGD. OFF. & WORKS : Pipe Nagar, Village, Sukeli, N.H.17, B.K.G. Road, Taluka-Roha, Distt. Raigad-402 126 (Maharashtra)

Phone: 02194-238511, 238512, 238567, 238569 • Fax: 02194-238513

MUMBAI OFFICE : 402, Sarjan Plaza, 100 Dr. Annie Besant Road, Opp. Telco Showroom, Worli, Mumbai-400 018

Phones: 022-2490 2570 /72 /74 • Fax: 022-2492 5473

HEAD OFFICE : 5, Pusa Road, 2nd Floor, New Delhi-110005 Phones : 011-28752862, 28756631 Email : jpldelhi@bol.net.in

KOLKATA OFFICE : Sukhsagar Apartment, Flat No. 8A, 8th Floor, 2/5, Sarat Bose Road, Kolkata - 700 020

Phone : 033-2455 9982, 2454 0053, 2454 0056 • Fax : 033 - 2474 2290 E-mail : msl@cal.vsnl.net.in

CHENNAI OFFICE : 3A, Royal Court. 41, Venkatnarayana Road, T. Nagar Chennai-600017

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NAMO NARAIN AGARWAL

M.Com, L.L.B, Company Secretary, FCS 234, CP 3331

372, Narmada Apartments, Alaknanda, New Delhi-110 019 GSTIN: 07ABVPN0836B2ZM

SAC: 998399 – other professional, technical and business services

Phone : 011-42143477 Mobile : 09899026864

Email : nnagarwal1939@gmail.com

PAN : ABVPN0836B

Secretarial Compliance Report of Maharashtra Seamless Ltd. for the year ended 31st March, 2021

(Pursuant to SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019 read with Regulation 24A (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

- I, Namo Narain Agarwal, have examined:
 - (a) all the documents and records made available to me and explanation provided by **Maharashtra Seamless Limited** (the "listed entity") (CIN: L99999MH1988PLC080545)
 - (b) the filings/ submissions made by the listed entity to the stock exchanges,
 - (c) website of the listed entity,
 - (d) NSE/BSE quarterly compliance reports, announcements etc.,
 - (e) any other document/ filing, as may be relevant, which has been relied upon to make this certification.

for the year ended **31st March**, **2021** ("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 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)
 Regulations, 2014; (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 and Redeemable Preference Shares) Regulations, 2013;

(Not applicable during the review pariod

(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 regarding the Companies Act and dealing with client;

(j) Other regulations as applicable

and circulars/ guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period:

(a) The listed entity has generally complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

S. No	Compliance Requirement (Regulations/ Circulars / guidelines including specific Clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Reg. 33 (3) of LODR	Delay in submission of unaudited financial results for quarter ended December, 2020, in March, 2021	This was due to fire in corporate office of the company on 05.01.2021. Stock Exchanges were duly informed of the developments and requested for extension.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.

(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

S. No. Action taken by	Details of Violation	Details of action taken E.g. fines, Warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any
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BSE/NSE imposed fine, vide their e-mails dated 15.03.2021 in respect of deviation mentioned at clause (a) above. The Company has, vide its letters dated 27.03.2021, requested for waiver of the fines in view of inordinate circumstances.

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

Sr. No.	Observations Of the Practicing Company Secretary in the previous Reports	Observations made in the secretarial Compliance report for the year Ended (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by The listed entity
	•	Not applicat	ole	

The fire accident in corporate office of the Company in January, 2021, in which some records were destroyed, and the prevailing circumstances in the country on account of Lockdown and COVID-19 have impacted, to some extent, my verification of documents and records of the Company.

Company Secretary CP 3331

Place: New Delhi

Date: 11 June, 2021

UDIN: F000234C000449155

Namo Narain Agarwal FCS 234, CP 3331