## SEACOAST SHIPPING SERVICES LIMITED

(Previously Known as Mahaan Impex Limited) CIN: L61100GJ1982PLC105654

Registered Office: 2<sup>nd</sup> Floor, Block N, Mondeal Retail Park, TP No.50, Nr. Rangoli Park, SG highway, Bodakdev, Ahmedabad-380054 Email: mahaanimpex@gmail.com Website: www.seacoastltd.com Tel. No:+91 -6351988376

Date: 30/05/2022

To,
The BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001
Scrip Code - 542753

To, The Calcutta Stock Exchange Limited 7, Lyons Range, Kolkata – 700 001

Scrip Code - 023490

<u>Sub: Submission of Annual Secretarial Compliance Report for the Period ended as on 31st March, 2022</u>

Dear Sir/Ma'am,

As per the Captioned Subject, We hereby submitting you Annual Secretarial Compliance Report as per the Regulation 24(A) of SEBI (LODR) Regulation, 2015 for the Period ended as on 31st March, 2022 received from the A. Santoki & Associates, Practicing Company Secretaries.

Kindly take on your records.

Yours faithfully,

For, Seacoast Shipping Services Limited

Pawansut Swami (Company Secretary)

## A. Santokį L. Associates

## **Company Secretaries**

Ajit M. Santoki B.B.A.,F.C.S.

203, AbhishekComplex, B/h. Navgujarat college, Income-Tax, Ahmedabad - 380014. (M) +91 9725437370

## <u>Secretarial compliance report of Seacoast Shipping Services Limited (Previously Known</u> <u>as Mahaan Impex Limited) for the year ended 31<sup>st</sup> March, 2022</u>

I Ajit M. Santoki, Proprietor of A. Santoki & Associates have examined:

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

For the year ended 31<sup>st</sup> March, 2022 ("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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agent) Regulations, 1993;

(j) Securities and Exchange Board of India (Depositaries and Participants) Regulations, 2018;

And Circulars/ guidelines issued thereunder;

and based on the above examination, I/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.	Regulation Name/ SEBI Circular Number	Regulation Number/ Circular Dated	Compliance Requirement (Regulations/ circulars / guidelines including specific clause	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	33	The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter.	The company has not submitted standalone results for the quarter ended September 2021 to the Exchange within prescribed due date.	The company has submitted only consolidated and xbrl results for the quarter ended September 2021 within due date i.e. 15.11.2021 and standalone submitted to the exchange after due date on 27.01.2022
2.	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17 (1)	The board of directors shall have an optimum combination of executive and non-executive directors with at least one woman director and not less than fifty percent of the board of directors shall comprise of non-executive directors.	The company does not have optimum strength of board of director as per regulation 17 (1) of Securities and Exchange Board of India (Listing and Disclosure Requirement Regulations, 2015).	We recommend to company to appoint Independent Directors as per Regulation 17 (1) of the Securities and Exchange Board of India (Listing and Disclosure Requirement Regulations, 2015).
3.	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	18 (1)	Every listed entity shall constitute a qualified and independent audit committee in accordance with the regulation 18	The company does not have minimum number of independent director as per regulation 18 (1) of Securities and Exchange Board of	We recommend to company to appoint Independent Directors for Qualified Independent Audit

				India (Listing and Disclosure Requirement	Committee
				Regulations, 2015).	
4.	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	19 (1) & 19 (2)	The board of directors shall constitute the nomination and remuneration committee in accordance with the regulation 19 (1) & (2)	The company does not have minimum number of independent director as per regulation 19 (1) & 19(2) of Securities and Exchange Board of India (Listing and Disclosure Requirement Regulations, 2015).	We recommend to company to appoint Independent Directors for Qualified Independent Audit Committee
5.	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17	Every Listed Company has required to appoint Full time Chief Financial Officer of the Company	The Company has not appointed the Chief Financial Officer	The post of the CFO of the Company is vacant.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far 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:

Sr. 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.
1.	Bombay Stock Exchange (BSE)	Regulation 33 Non-compliance with Regulation 33 of SEBI (LODR) Regulations, 2015 for quarter ended September 2021	Fine	The BSE has imposed the Fine for the Violation of the mentioned regulation.

2.	Bombay Stock	Regulation 17(1)	Fine	The BSE has
	Exchange (BSE)	Non-compliance with the		imposed the Fine for
		requirements pertaining to the		the Violation of the
		composition of the Board		mentioned
		including failure to appoint		regulation.
		woman director		
3.	Bombay Stock	Regulation 18(1)	Fine	The BSE has
	Exchange (BSE)	Non-compliance with the		imposed the Fine for
		constitution of audit committee		the Violation of the
				mentioned
				regulation.
4.	Bombay Stock	Regulation 19(1)/ 19(2)	Fine	The BSE has
"	Exchange (BSE)	Non-compliance with the		imposed the Fine for
		constitution of nomination and		the Violation of the
		remuneration committee		mentioned
				regulation.
				1 - 2 - 1 - 2 - 1 - 1 - 1

(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	the secretarial compliance report for the year ended 31 <sup>st</sup> March, 2021	by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	The Company has issue the Bonus Shares in their Board Meeting held as on 03.09.2020 and Get the Shareholders Approval as on 29.09.2020 and The Same has implemented as on 08.02.2021	implementation of Bonus issue was 02.11.2020 and	for the Violation of the mentioned regulation and company has	Fine for the violation has been paid by the company
2.	The Trading Approval from the Stock Exchange as on 27.11.2020 and the due date for the Trading Application was 08.12.2020. The Company make the application as on 09.01.2021		for the Violation of the mentioned	Fine for the violation has been paid by the company

3.	The Company has not	The post of the CFO of	The company has	The company
		the Company is vacant		
		due to Resignation of Mr.		appointed CFO.
	after the Resignation of	Pratikkumar Goda from		
	Mr. Pratikkumar Goda	the Post of CFO w.e.f.	>	9
	from the Post of CFO.	20.07.2020. The Company		
		has not appointed the		
		CFO after the resignation.		15

Date: 30.05.2022 Place: Ahmedabad

UDIN: F004189D000436159

For, A. Santoki & Associates (Company Secretaries)

Ajit M. Santoki (Proprietor)

C.O.P. No. 2539