SEAMEC LIMITED
A member of MMG
MH AGRAWAL GROUP

Regd. Office: A-901-905, 9th Floor, 215 Atrium, Andheri Kurla Road, Andheri (East), Mumbai 400 093, India
Tel.: +91-22-6694 1800 • Fax : +91-22-6694 1818 • E-mail : contact@seamec.in • CIN : L63032MH1986PLC154910

SEAMEC/BSE&NSE/SMO/ASCR/2805/2025

May 28, 2025

Corporate Relations Department **BSE Limited** **Phirojee Jeejeebhoy Towers,** **Dalal Street,** **Mumbai – 400001**	**The Manager Listing Department** **National Stock Exchange of India Limited** **Exchange Plaza, Plot No. C/1, G Block,** **Bandra-Kurla Complex, Bandra (East)** **Mumbai - 400051**
Scrip Code: 526807	**Trading Symbol: SEAMECLTD**

Sub: Annual Secretarial Compliance Report for the financial year ended March 31, 2025

Dear Sir / Madam,

Pursuant to Regulation 24A (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2025 issued by M/s. Satyajit Mishra & Co., Company Secretaries.

Kindly take the above on record.

Yours Faithfully,

For SEAMEC LIMITED

S.N. Mohanty
President – Corporate Affairs, Legal and Company Secretary

Satyajit Mishra & Co.
Company Secretaries

To
The Board of Directors
SEAMEC LIMITED
9th Floor, A 901 - 905, 215 Atrium,
Andheri Kurla Road, Andheri East,
Mumbai 400093.

Dear Sir(s),

Sub.: Annual Secretarial Compliance Report for the Financial Year 2024-25:

I have been engaged by SEAMEC LIMITED (hereinafter referred to as the Company) bearing CIN: L63032MH1986PLC154910 whose Equity Shares are listed on National Stock Exchange of India Limited and/or BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

My audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Annual Secretarial Compliance Report is enclosed.

For Satyajit Mishra & Co.
Company Secretaries
Peer Reviewed
SATYAJIT MISHRA
Digitally signed by SATYAJIT MISHRA
Date: 2025.05.27 11:09:12 +05'30'
Satyajit Mishra
Membership No.:5759
CP No.:4997
PR No. 1769/2022
UDIN: F005759G000435751

Place: Mumbai

Date: May 27, 2025

Unit 404, Kamlacharan Commercial Premises Co-op Soc. Ltd., Jawahar Nagar Phatak, Above SRV Hospital, Goregaon (West), Mumbai 400 062
Tel.: 9820264847 Email: cs.smishra@gmail.com

Satyajit Mishra & Co.
Company Secretaries

Secretarial Compliance Report of SEAMEC Limited
for the financial year ended 31st March, 2025

I have examined:

(a) all the documents and records made available to us and explanation provided by **SEAMEC 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 31st March, 2025 ("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 and amendments from time to time;

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 and amendments from time to time;

(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 and Sweat Equity) Regulations, 2021;

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Unit 404, Kamlacharan Commercial Premises Co-op Soc. Ltd., Jawahar Nagar Phatak, Above SRV Hospital, Goregaon (West), Mumbai 400 062
Tel.: 9820264847 Email: cs.smishra@gmail.com

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;

(h) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018 and circulars/issued thereunder;

(i) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	**Secretarial Standards:** The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Complied
2.	**Adoption and timely updation of the Policies:** ● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed 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	Complied
	Maintenance and disclosures on Website: ● The Listed entity is maintaining a functional website ● Timely dissemination of the documents/ informationunder a separate section on the website ● Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate andspecific which re- directs to the relevant document(s)/section of the website	Yes	Complied

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4.	**Disqualification of Director:** 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	Complied
5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes	Complied
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	Complied
7.	**Performance Evaluation:** The listed entity has conducted performance evaluationof the Board, Independent Directors and the Committeesat the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	Complied
8.	**Related Party Transactions:** (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/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes NA	Complied There is no such transaction(s) during the period under review.
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	Generally compiled except specified in clause (a) {Page No. 7} of this Report.
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	Complied

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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 underseparate paragraph herein (**).	Yes	No action taken by SEBI or Stock Exchanges
12.	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc.	NA	No additional non-compliance observed.

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	**Compliances with the following conditions while appointing/re-appointing an auditor**		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or **ii.** If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or **iii.** If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	No such event happened during the year.
2.	**Other conditions relating to resignation of statutory auditor**		
	i. Reporting of concerns by Auditor with respect to the listed entity /its material subsidiary to the Audit Committee: **a.** In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached	NA	No such event happened during the year.

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	the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.		
	b. In case the auditor proposes to resign,all concerns with respect to the proposed resignation, along with relevant documentshas been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receiptof information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.	NA	No such event happened during the year.
	c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information fromthe auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.	NA	No such event happened during the year.
	ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	NA	No such event happened during the year.
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	NA	No such event happened during the year.

*Observations /Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA.'

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

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 Practicing Company Secretary	Management Response	Remarks
1	To file Outcome of BM within 30 minutes of conclusion of Board meeting as per Regulation 30 (6) of SEBI (LODR), Regulations, 2015	Regulation 30 (6) of SEBI (LODR), Regulations, 2015 Read with sub-para 4 of Para A of Part A of Schedule III and SEBI circular no. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/1	The Company has filed the Outcome of Board Meeting held on May 28, 2024 (for considered and approved financial results) to BSE with marginal delay of 2 minutes.	No Action taken by BSE Limited ("BSE")	-	As stated in deviations column	NA	Outcome of BM dated 28.05.2024 to consider and approve financial results for the quarter / year ended March 31, 2024 is filed with marginal delay of 2 minutes on BSE portal.	This is due to technical problem.	Advised to take due care and file within time specified under SEBI Regulations in future.

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		23 dated 13.07.2023								
2	To give Intimation of Institution of Arbitration Proceedings as per schedule III Part A Para B sub para 8 of SEBI Circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023 And Regulation 30, of SEBI (LODR), Regulations, 2015	Regulation 30 of SEBI (LODR), Regulations, 2015 read with Schedule III Part A Para B sub para 8 of Schedule III and SEBI Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023	The Company has filed Intimation for Institution of Arbitration Proceedings with delay of 1 day.	No Action taken by Stock Exchanges (BSE and NSE)	-	As stated in deviations column.	NA	The Company has filed Intimation for Institution of Arbitration Proceedings with delay of 1 day.	The Statement of Claims was filed by the Lawyer in UK at Indian Time 6:34 p.m. on 6th December, 2024 (Friday). Due to intervening period of Saturday and Sunday, this intimation was filed with the Stock Exchanges on Monday, 9th December, 2024 morning. Hence, no delay based on official days.	Management response noted.
3	Disclosure of material event Regulation 30, of SEBI (LODR), Regulations, 2015,	Regulation 30, of SEBI (LODR), Regulati	The Company has filed Disclosure of material event (Received	No Action taken BSE Limited ("BSE") / NSE Limited ("NSE")	-	As stated in deviation column	NA	The Company has filed Disclosure of material event (Received Letter of Award from L&T) with delay of 8 days.	The delay is attributed to procedural clarification.	Advised to take due care and file within time specified

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	as per Clause 4 of Para B of Part A of Schedule III and SEBI Circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023.	ons, 2015 and Clause 4 of Para B of Part A of Schedule III	Letter of Award from L&T) with delay of 8 days.								under the SEBI regulations in future.

(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 in the previous reports	Observations made in the secretarial compliance report for the year ended	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
1	Delay of 1 day in prior intimation of declaration Interim Dividend to NSE and BSE.	31.03.2024	Prior intimation of declaration of Interim Dividend under regulation 29 of SEBI (LODR) Regulations, 2015	There is Delay of 1 day in prior intimation of declaration Interim Dividend to NSE and BSE. NSE and BSE levied a fine of Rs. 10,000 separately.	The Company has already filed intimation and paid the fine levied by NSE and BSE. Issue resolved.	Complied.

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2	Delayed in filing of outcome of Board Meeting held on August 10, 2023 by 4.52 minutes to BSE.	31.03.2024	Filing of outcome of Board meeting under regulation 30 of SEBI (LODR) Regulations, 2015	There was Delayed in filing of outcome of Board Meeting held on August 10, 2023 by 4.52 minutes to BSE. No action taken.	Delay was explained and issue resolved.	Complied.

For Satyajit Mishra & Co.
Company Secretaries
Peer Reviewed
SATYAJIT MISHRA Digitally signed by SATYAJIT MISHRA Date: 2025.05.27 11:12:13 +05'30'
Satyajit Mishra
Membership No.:5759
CP No.:4997
PR No. 1769/2022

Place: Mumbai

Date: May 27,2025.

UDIN: F005759G000435751