

SEA GOLD INFRASTRUCTURE LIMITED

CIN: L70200TG1993PLC016389

(Formerly known as SEA GOLD AQUA FARMS LIMITED)

Regd. Office: Plot No.270E/A, MCH No.985, Road No.10, Jubilee Hills,
Hyderabad – 500 033, Phone No: +91 – 40 – 23544558, Fax: +91 – 40 – 23544558

Email: seagoldacqa@gmail.com, Website: www.seagoldaqua.com

Hyderabad, December 2, 2020

To
The Department of Corporate Services
BSE Limited
25th Floor, P J Towers,
Dalal Street, Fort,
Mumbai – 400001

Dear Sir/Madam,

Sub.: Annual General Meeting – Submission of Annual Report 2019-20 - Regulation 34(1).

Ref: – BSE Scrip Code: 530361 (SEA GOLD INFRASTRUCTURE LTD)

Pursuant to Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 we enclosing herewith Annual Report of the Company for the FY 2019-20 along with the Notice of 26th Annual General Meeting of the Company Scheduled to be held on Thursday, 31st December, 2020 at 4.00 P.M at the Registered office of the Company situated at Plot No. 270/E/A, Road No.10, MCH No.985, Jubilee Hills, Hyderabad – 500 033, Telangana, INDIA.

Kindly take the same on record and acknowledge the receipt of the same.

Thanking You,
Yours Faithfully,

For SEA GOLD INFRESTRUCTURE LTD
(Formerly known as Sea Gold Aqua Forms Ltd)

Sd/-
Vijayalakshmi Panati
Managing Director
DIN: 06635011

SEA GOLD INFRASTRUCTURE LIMITED
(Formerly known as Sea Gold Aqua Farms Limited)

Twenty Sixth Annual Report
2019-2020

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CORPORATE INFORMATION

BOARD OF DIRECTORS

Smt. Vijayalakshmi Panati
Sri. Syed Khaleel Ahmed
Sri. Sathaiah Bathula

Promoter and Managing Director
Independent and Non-Executive Director
Independent and Non-Executive Director

CORPORATE IDENTITY NUMBER:

L70200TG1993PLC016389

KEY MANAGERIAL PERSONNEL

Smt. Riddhi Suresh Badiyani
Sri. Srinivas Jakkani

Company Secretary
Chief Financial Officer

STATUTORY AUDITORS

M/s. Ramesh Athasniya&Co
Chartered Accountants
5-9-1121, F-45 and 46, 1st Floor
Agarwal Chambers, King Koti
Hyderabad - 500001, Telangana

REGISTERED OFFICE

Plot No. 270/E/A, M.C.H.No.985, Road
No.10, Jubilee Hills, Hyderabad-500033

REGISTRAR AND SHARE TRANSFER AGENT

M/s. Venture Capital and Corporate
Investments Private Limited
#12-10-167, Bharat Nagar, Hyderabad-18,
Telangana, Email: info@vccilindia.com

BANKERS:

1) HDFC Bank Limited
H.No. 8-3-168/E2/152, Krishna Kunj,
Motinagar, Hyderabad – 500 018

2) Andhra Bank, Ramanthapur Branch
Hyderabad Public School Campus, Hyderabad
– 500 013

STATUTORY COMMITTEES

AUDIT COMMITTEE

Mr. Syed Khaleel Ahmed	Chairman
Mrs. Vijayalakshmi Panati	Member
Mr. Sathaiah Bathula	Member

NOMINATION AND REMUNERATION COMMITTEE

Mr. Syed Khaleel Ahmed	Chairman
Mrs. Vijayalakshmi Panati	Member
Mr. Sathaiah Bathula	Member

STAKEHOLDERS RELATIONSHIP COMMITTEE

Mr. Syed Khaleel Ahmed	Chairman
Mrs. Vijayalakshmi Panati	Member
Mr. Sathaiah Bathula	Member

RISK MANAGEMENT COMMITTEE

Mr. Syed Khaleel Ahmed	Chairman
Mrs. Vijayalakshmi Panati	Member
Mr. Sathaiah Bathula	Member

IMPORTANT COMMUNICATION TO MEMBERS

1. The Ministry of Corporate Affairs has taken a “Green Initiative in the Corporate Governance” by allowing paperless compliances by the Companies and has issued circulars stating that service of the notice/documents including Annual Report can be sent by e-mail to its members. To support this green initiative of the Government in full measure, members who have not registered their e-mail addresses, so far, are requested to register their e-mail addresses, in respect of electronic holding with the Depository through their concerned Depository Participants. Members who hold shares in physical form are requested to register the same with the following addresses.

SEBI has made it mandatory for every participant in the Securities/Capital Market to furnish the details of Income Tax Permanent Account Number (PAN). Accordingly, all the shareholders holding shares in physical form are requested to submit their details of PAN along with photocopy of both sides of PAN card, duly attested to the Demat Registrar and Share Transfer Agent of the Company, M/s Sea Gold Infrastructure Limited as above.

NOTICE OF ANNUAL GENERAL MEETING

Notice is hereby given that the **26th Annual General Meeting** of the Members of M/s. **SEA GOLD INFRASTRUCTURE LIMITED** will be held on **Thursday, the 31st day of Deceember, 2020 at 04.00 P.M** at the Registered office of the company situated at **Plot No. 270/E/A, M.C.H.No.985, Road No.10, Jubilee Hills, Hyderabad-500033** to transact the following business:

ORDINARY BUSINESS:

Item No. 1 – Adoption of financial statements

To receive, consider and adopt the audited financial statements of the Company for the financial year ended 31st March 2020 along with Notes, the Reports of the Board of Directors and the Auditors thereon.

Item No. 2 -- Appointment of Director

To appoint a Director in place of Mr. Syed Khaleel Ahmed, Director (holding DIN 05347153), who retires by rotation and being eligible offers herself for re-appointment.

for and on behalf of the Board
for Sea Gold Infrastructure Limited

Date : 02.09.2020
Place : Hyderabad

Sd/-
Vijayalakshmi Panati
Managing Director
DIN: 06635011

REGISTERED OFFICE

CIN: L70200TG1993PLC016389
Plot No. 270/E/A, M.C.H.No.985, Road No.10,
Jubilee Hills, Hyderabad-500033, Telangana, India

Notes:

1. **The statement of the particulars of Directors seeking Appointment / Re-appointment is enclosed as Annexure A.**
2. **A Member entitled to attend and vote at the meeting is entitled to appoint a proxy to attend and vote instead of himself and the proxy need not be a Member of the Company. Proxies in order to be effective must be received by the Company at its registered office not later than 48 (forty-eight) hours before the commencement of the meeting. Proxies submitted on behalf of companies, societies, etc. must be supported by an appropriate resolution/authority, as applicable.**
3. **A person shall not act as a Proxy for more than 50 members and holding in the aggregate not more than ten percent of the total voting share capital of the Company. However, a single person may act as a proxy for a member holding more than ten percent of the total voting share capital of the Company provided that such person shall not act as a proxy for any other person.**
4. Every member entitled to vote at the Annual General Meeting of the Company can inspect the proxies lodged at the Company at any time during the business hours of the Company during the period beginning 24 (twenty-four) hours before the time fixed for the commencement of the Annual General Meeting and ending on the conclusion of the meeting. However, a prior notice of not less than 3 (three) days in writing of the intentions to inspect the proxies lodged shall be required to be provided to the Company.
5. The Register of Members and the Share Transfer Books of the Company will remain closed from 22nd September 2020 to 28th September, 2020 (both days inclusive).
6. Members are requested to bring the Attendance Slip duly filled in and signed attendance slip mentioning therein details of their DP ID and Client ID/ Folio No. which is enclosed herewith and hand over the same at the entrance of AGM venue.
7. Members who hold shares in dematerialised form are requested to bring their depository account Number (Client Id and DP Id No) for easier identification and recording of the attendance at the meeting.
8. In case of joint holders attending the Meeting, only such joint holder who is higher in the order of names will be entitled to vote at the Meeting.
9. Corporate Members intending to send their authorized representatives to attend the Meeting pursuant to Section 113 of the Companies Act, 2013 are requested to send to the Company, a certified copy of the relevant Board Resolution together with their respective specimen signatures authorizing their representative(s) to attend and vote on their behalf at the Meeting.
10. Members/Proxies are requested to bring their copies of Annual Report to the meeting. As an austerity measure, copies of Annual Report will not be distributed at the meeting. Members may also note that the Notice of the 26th AGM and the Annual Report for 2020 will also be available on the Company's website www.seagoldaqua.com for download.

11. Members desirous of seeking any information on the accounts or operations of the company are requested to write to the Company at least 10 days prior to the Meeting so that the required information can be made available at the Meeting.
12. In terms of Section 72 of the Companies Act, 2013, a member of the company may nominate a person on whom the shares held by him/her shall vest in the event of his/her death. Members desirous of availing this facility may submit nomination in prescribed Form-SH-13 to the company/RTA in case shares are held in physical form, and to their respective depository participant, if held in electronic form.
13. Members holding shares in physical form are requested to advise any change of address immediately to the Company's Registrar & Share Transfer Agent, M/s Venture Capital and Corporate Investments Private Limited. Members holding shares in electronic form must send the advice about the change of address to their respective Depository Participants (DPs) and not to the Company. Non-resident Indian shareholders are requested to inform us immediately the change in the residential status on return to India for permanent settlement.
14. Members holding shares under multiple folios are requested to consolidate their holdings, if the shares are held in the same name or in the same order of names.
15. The equity shares of the Company have been notified for compulsory trading in demat form. The Company has signed a tripartite agreement with National Securities Depository Limited (NSDL), Central Depository Services (India) Limited (CDSL) and M/s. Venture Capital and Corporate Investments Private Limited to facilitate dematerialisation of shares. Members are requested to avail of this facility and have their shareholding converted into dematerialised form.
16. All Documents referred to in the accompanying notice and the Explanatory Statement is open for inspection at the registered office of the company on all working days between 11.00 a.m. and 1.00 p.m. up to the date of the Annual General Meeting.
17. Any director himself or any member intending to propose any person as a director other than a retiring director, has to give a notice as to his intention to propose him/her as a candidate for that office not less 14 (fourteen) days before the meeting along with deposit of Rs.1,00,000 (Rupees One Lakh).
18. The Ministry of Corporate Affairs has taken a "Green Initiative in the Corporate Governance" by allowing paperless compliances by the companies and has issued circulars stating that service of notice/documents including Annual Report can be sent by e-mail to its members. To support this green initiative of the Government in full measure, members who have not registered their e-mail addresses, so far, are requested to register their e-mail addresses, in respect of dematerialised holdings with their respective Depository Participants. Members who hold shares in physical form are requested to fill and send the required details to the Registrar and Share Transfer Agent, M/s. Venture Capital and Corporate Investments Private Limited at # 12-10-167, Bharat Nagar, Hyderabad – 500018.
19. In terms of Sections 124 of the Companies Act, 2013 the amount of dividend remaining unclaimed or unpaid for a period of seven years from the date of transfer to the unpaid dividend account is required to be transferred to the Investor Education and Protection Fund (IEPF). Shareholders are requested to ensure that they claim the dividend(s) from the

Company before transfer of the said amounts to the IEPF (Corresponding to Section 205A of the erstwhile Companies Act, 1956).

20. The Securities Exchange Board of India (SEBI) has mandated the submission of Permanent Account Number (PAN) by every participant in securities market. Members holding shares in electronic form are, therefore requested to submit the PAN to their Depository Participant with whom they are maintaining their demat accounts. Members holding shares in physical form can submit their PAN details to the Company's Registrar and Transfer Agent.
21. Members holding shares in the company and who have not registered their mail id with the company or the depository and wish to avail e voting may write to the registrar or the company quoting their client id/folio no and DP id so as to send the password for e voting and hard copy of the ballot paper will be provided at the venue of the AGM for those members who have not exercised their e-voting.

22. Voting through electronic means:

In compliance with the provisions of section 108 of the Companies Act, 2013, the Companies (Management and Administration) Rules, 2014, amended by the Companies (Management and Administration) Amendment Rules, 2016 and Regulation 44 of the listing agreement, shareholders are provided with the facility to cast their vote electronically, through the Remote e-voting services provided by Sea Gold Infrastructure Limited, in respect of all resolutions set forth in this Notice.

The Company is also providing the facility for voting by way of physical ballot at the Annual General Meeting. Mr. N. V. S. S. Suryanarayana Rao, Practicing Company Secretary has been appointed as the Scrutinizer to scrutinize the Remote e-voting process as well as the Ballot process at the Annual General Meeting in a fair and transparent manner.

The procedure and instructions for Remote e-voting are as follows:

- i) Open your web browser during the voting period and navigate to 'www.evotingindia.com'
- ii) Enter the login credentials (i.e., user-id & password) mentioned in the e-mail / covering letter. Your folio/DP Client ID will be your User-ID.

User – ID For shareholders holding shares in Demat Form:

- a) For NSDL: - 8 Character DP ID followed by 8 Digits Client ID
- b) For CDSL: - 16 digits beneficiary ID.
- c) ID for shareholders holding shares in Physical Form:

The shareholders whose email id is not registered with the company and who intend to exercise their vote, may write to the company at seagoldacqa@gmail.com or to the registrar and transfer

agent M/s Venture Capital and Corporate Investments Private Limited so as to send the user id and password for e voting.

iii) Please contact M/s Venture Capital and Corporate Investments Private Limited, Telephone No. 040 – 23818475 for any support or clarifications in relation to E-Voting.

iv) Shareholders can cast their vote online from 27th September, 2020 (9.00 AM) to 29th September, 2020 (5.00 PM). During this period, shareholders of the company holding shares either in dematerialized or physical form as on the cut-off date viz., 22nd September, 2020, may cast their vote electronically.

v) After entering these details appropriately, click on “LOGIN”.

vi) In case of first login, shareholders holding shares in Demat/Physical form will now reach Password Change menu wherein they are required to mandatorily change their login password in the new password field. The new password has to be minimum eight characters consisting of at least one upper case (A-Z), one lower case (a-z), one numeric value (0-9) and a special character. Kindly note that this password can be used by the Demat holders for voting for resolution of any other Company on which they are eligible to vote, provided that Company opts for e-voting through Sea Gold Infrastructure Limited e-Voting platform. System will prompt you to change your password and update any contact details like mobile number, email ID etc on first login. You may also enter the Secret Question and answer of your choice to retrieve your password in case you forget it. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.

vii) You need to login again with the new credentials

viii) On successful login, system will prompt to select the ‘Event’ i.e., ‘Company Name’ viz Sea Gold Infrastructure Limited.

ix) If you are holding shares in Demat form and had logged on to “www.evotingindia.com” and cast your vote earlier for any company, then your existing login id and password are to be used.

x) On the voting page, you will see Resolution Description and against the same the option ‘FOR/ AGAINST/ABSTAIN’ for voting .Enter the number of shares (which represents number of votes) under ‘FOR/AGAINST/ABSTAIN’ or alternatively you may partially enter any number in ‘FOR’ and partially in ‘AGAINST’, but the total number in ‘FOR/AGAINST’ taken together should not exceed your total shareholding. If the shareholder does not want to cast, select ‘ABSTAIN’.

xi) After selecting the resolution, you have decided to vote on, click on “SUBMIT” A confirmation box will be displayed If you wish to confirm your vote, click on “OK”, else to change your vote, click on “CANCEL” and accordingly modify your vote.

xii) Once you ‘CONFIRM’ your vote on the resolution, you will not be allowed to modify your vote.

xiii) Corporate/Institutional Members (corporate/FIs/FLLs/Trust/Mutual Funds/Banks etc.,) are required to send scan (PDF format) of the relevant Board resolution to the Scrutinizer through e-mail to csnvss@gmail.com with copy to helpdesk.evoting@cdslindia.com. The file/scanned image of the Board Resolution should be in the naming format “Corporate Name_ Event no.”

xiv) The Members attending the meeting should note that those who are entitled to vote but have not exercised their right to vote through e-voting, may vote at the AGM through physical ballot for all the business specified in the accompanying Notice. The Members who have exercised their right to vote by e-voting may attend the AGM but shall not vote at the AGM. If a member casts vote by both modes, then voting done through e-voting shall prevail and the Ballot form shall be treated as invalid.

xv) The Scrutinizer shall within a period not exceeding three working days from the conclusion of the e-voting period unblock the votes in the presence of at least two witnesses not in the employment of the Company and make a Scrutinizer’s Report of the votes cast in favor or against, if any, forthwith to the Chairman of the Company.

xvi) The results shall be declared on or after the AGM of the Company. The results along with the Scrutinizer’s Report shall be placed on the Company’s website www.seagoldaqua.com.

for and on behalf of the Board
for Sea Gold Infrastructure Limited

Date : 02.09.2020
Place : Hyderabad

Sd/-
Vijayalakshmi Panati
Managing Director
DIN: 06635011

Details of Directors seeking appointment / re-appointment in the 26th Annual General Meeting (Pursuant of Clause 49 of the Listing Agreement)

Name of the Director	Mr. Syed Khaleel Ahmed
Director Identification Number (DIN)	05347153
Date of Birth	10/05/1973
Nationality	Indian
Date of Appointment on Board	14/08/2012s
Relationship with other Directors	Nil
Qualification	B.Tech
Shareholding in Sea Gold Infrastructure Limited (as on 31 st March, 2020)	Nil
Expertise in specific functional areas	Nil
List of Directorships held in other Companies (as on 31 st March, 2020)	Nil
Memberships / Chairmanship of the Committees of Directors of other Companies (as on 31 st March, 2020)	Nil

**FORM FOR REGISTRATION OF EMAIL ADDRESS FOR RECEIVING DOCUMENTS
/ NOTICES BY ELECTRONIC MODE**

To
M/s Venture Capital and Corporate Investments Private Limited,
#12-10-167, Bharat Nagar,
Hyderabad-18,
Telangana, India.

ADDRESS

Company: SEA GOLD INFRASTRUCTURE LIMITED

I agree to receive all documents / notices including the Annual Report from the Company in electronic mode. Please register my email address given below in your records for sending communication through email.

Name of Sole / First Holder : _____

DP ID / Client ID / Regd. Folio No. : _____

PAN No. : _____

E-mail Address : _____

Date:

Place:

(Signature of Member)

BOARD'S REPORT

To
The Members
Sea Gold Infrastructure Limited

Your Directors have pleasure in presenting their 26th Annual Report on the business and operations of your company with the Audited Statement of Accounts for the Financial Year ended March 31, 2020.

FINANCIAL RESULTS

The standalone financial performance of the Company for the financial year ended March 31, 2020 is summarized below:

STANDALONE		(Amount in Rupees)	
Particulars	2019-20	2018-19	
Revenue from operations	Nil	Nil	
Other Income			
Total Income			
Total Expenditure	20,72,614	8,09,153	
Depreciation	14,232	14,230	
Profit/(Loss) before exceptional and extraordinary items and tax	(20,86,846)	(8,23,383)	
Less: exceptional and extraordinary items	Nil	Nil	
Profit / (Loss) before taxation	(20,86,846)	(8,23,383)	
Less: - Current Tax	Nil	Nil	
- Income Tax (Earlier years)	Nil	Nil	
- Deferred Tax	(445)	(1,302)	
Profit/(Loss) after Tax	(20,87,291)	(8,24,685)	
Earnings per equity shares in Rs.	(0.38)	(0.15)	

OPERATIONS:

During the year under review and during the previous year, the Company did not earn any revenue. The Loss after tax for the year increased to Rs. 20,87,291/- compared to Rs. 8,24,685/- in the previous year.

REVIEW OF PERFORMANCE AND STATE OF THE COMPANY'S AFFAIRS

During the year under review, operations were well carried out by the Company with increased capacity utilization, turnover should improve further. There is strong belief that this business improvement will sustain in the future too. Scenario for future opportunities is bright.

CHANGE IN THE NATURE OF BUSINESS, IF ANY:

There is no change in the nature of business during the year.

MATERIAL CHANGES AND COMMITMENTS, IF ANY, AFFECTING THE FINANCIAL POSITION OF THE COMPANY WHICH HAVE OCCURRED BETWEEN THE END OF THE FINANCIAL YEAR OF THE COMPANY TO WHICH THE FINANCIAL STATEMENTS RELATE AND THE DATE OF THE REPORT

There are no other Material Changes and Commitments affecting the financial position of the Company which occurred between the end of the financial year to which the financial statements relate and the date of this Report.

Covid-19 pandemic has impacted the Financial Position of the company at the end of the financial year.

We expect that this uncertainty may continue further. We are looking at downsizing expenditure.

DIVIDEND AND TRANSFER TO RESERVES

During the period under review the company has not declared any dividend.

There were no transfers to Reserves during the financial year 2019-20.

SHARE CAPITAL

During the period under review, there has no change in the Share Capital of the Company. The Authorized Share Capital of the Company is Rs.5,50,00,000 divided into 55,00,000 equity shares of Rs.10/- (Rupees Ten) each.

The Issued, Subscribed and Paid up Capital of the Company as on March 31, 2020 is Rs.5,44,824,00 divided into 54,48,240 equity shares of Rs. 10 (Rupees Ten) each.

The Company has not issued any shares with differential rights and hence no information as per provisions of Section 43(a)(ii) of the Act read with Rule 4(4) of the Companies (Share Capital and Debenture) Rules, 2014 is furnished.

DIRECTORS AND KEY MANAGERIAL PERSONNEL

The Board of directors of your company is duly constituted with four executive directors and four non- executive independent directors.

Approval of the shareholders is being sought for re-appointment of Sathaiah Bathula (holding DIN 07277786), Director, retires by rotation at the ensuing Annual General Meeting and being eligible, offers himself for reappointment in accordance with the Companies Act, 2013 read with Articles of Association of the Company.

During the period under review the following changes took place in the Board:

- Riddhi Suresh Badiyani was appointed as Company Secretary of the Company as on 27.08.2019
- Srinivas Jakkani was appointed as CFO of the Company as on 09.08.2019
- Vijayalakshmi Panati was appointed as Managing Director of the Company with effect from 20.08.2019

During the Period under review Board of Directors has accepted the resignation of Mr.Venkata Krishna Reddy Panati with effect from 20.08.2019 & Mr. Rajasekhar Reddy Mathuru with effect from 03.03.2020.

NUMBER OF MEETINGS OF THE BOARD:

A calendar of Meetings is prepared and circulated in advance to the Directors. During the year Nine (9) Board Meetings were convened and held. The gap between any two Board Meetings is within the period as prescribed under the Companies Act, 2013 and Listing Agreement.

Dates on which the Board Meeting were held	
S.No.	Date of Board Meeting
1	30.05.2019
2	09.08.2019
3	14.08.2019
4	20.08.2019
5	27.08.2019
6	02.09.2019
7	14.11.2019
8	14.02.2020
9	03.03.2020

The Attendance of Directors at these Board Meetings is as under:

Name of Directors	No. of meetings held during the tenure of the Director	No. of meetings attended by the Director	Whether present at the previous AGM
Mr. Venkata Krishna Reddy Panati	4	4	No
Mr.Rajasekhar Mathuru Reddy	8	8	Yes
Mr.Syed Khaleel Ahmed	9	9	Yes
Mrs. Vijayalakshmi Panati	9	9	Yes
Mr. Sathaiah Bathula	9	9	Yes

DECLARATIONS BY INDEPENDENT DIRECTORS:

The Company has received declarations from the Independent Directors under Section 149(6) of the Companies Act, 2013 confirming their independence vis-à-vis the Company.

FAMILIARISATION PROGRAMME FOR INDEPENDENT DIRECTORS

The Company shall through its Senior Managerial personnel familiarise the Independent Directors with the strategy, operations and functions of the Company. The Independent Directors will also be familiarised with their roles, rights and responsibilities and orientation on Statutory Compliances as a Board Member.

On appointment of the Independent Directors, they will be asked to get familiarised about the Company's operations and businesses. An Interaction with the key executives of the Company is also facilitated to make them more familiar with the operations carried by the company. Detailed presentations on the business of the company are also made to the Directors. Direct meetings with the Chairman and the Managing Director are further facilitated for the new appointee to familiarize him/her about the Company/its businesses and the group practices as the case may be and link is available at the website www.seagoldaqua.com.

REMUNERATION POLICY

The Company's remuneration policy is driven by the success and performance of the individual employee and the Company. Through its compensation programme, the Company endeavours to attract, retain, develop and motivate a high-performance workforce. The Company follows a compensation mix of fixed pay, benefits and performance based variable pay. Individual performance pay is determined by business performance and the performance of the individuals measured through the annual appraisal process.

The Board has, on the recommendation of the Nomination & Remuneration Committee framed a policy for selection and appointment of Directors, Senior Management and their remuneration including criteria for determining qualifications, positive attributes and independence of a director. The Remuneration Policy is available on the website of the Company viz. www.seagoldaqua.com

DIRECTORS' RESPONSIBILITY STATEMENT

Pursuant to the requirement under section 134 (3) and (5) of the Companies Act 2013, with respect to Directors' Responsibility Statement, your board of directors to the best of their knowledge and ability confirm that:

- a. in the preparation of the annual accounts for the financial year ended March 31, 2020, the applicable accounting standards have been followed along with proper explanation relating to material departures;
- b. the accounting policies mentioned in notes to Financial Statements have been selected

and applied consistently and the Directors made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company as at 31st March, 2020 and of the profit/loss of the Company for that year;

- c. proper and sufficient care was taken for the maintenance of adequate accounting records in accordance with the provisions of Companies Act, 2013 for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;
- d. the annual financial statements of the Company have been prepared on a 'going concern' basis;
- e. proper internal financial controls have been laid down to be followed by the Company and such internal financial controls are adequate and were operating effectively; and
- f. proper systems have been devised to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

CONSTITUTION OF AUDIT COMMITTEE

The Audit Committee of the Company is duly constituted as per Section 177 of the Companies Act, 2013. During the year four (4) Audit Committee Meetings were convened and held as follows:

Dates on which the Audit Committee Meetings were held	
Sl.No.	Date of Board Meeting
1	30.05.2019
2	14.08.2019
3	14.11.2019
4	14.02.2020

The members of Audit Committee are:

Mr. Syed Khaleel Ahmed	Chairman
Mrs. Vijayalakshmi Panati	Member
Mr. Sathaiah Bathula	Member

However during the Year under review Company has reconstituted the Committee.

SCPOE OF COMMITTEE:

The terms of reference of the Audit Committee include the following:

- a) Oversight of the Company's financial reporting process and the disclosure of its financial Information to ensure that the financial statement is correct, sufficient and credible;
- b) Recommending the appointment, removal of external auditors, fixation of audit fee, terms of appointment and also approval for payment for any other services.

- c) Reviewing with the management, the annual financial statements and auditor's report thereon before submission to the Board for approval, focusing primarily on:
- Matters required to be included in the director's responsibility statement to be included in the board's report in terms of clause (c) of sub-section (3) of Section 134 of the Companies Act, 2013;
 - Any changes in accounting policies and practices and reasons for the same;
 - Major accounting entries involving estimates based on the exercise of judgment by management;
 - Qualifications in the draft audit report;
 - Significant adjustments made in the financial statements arising out of audit;
 - The going concern assumption;
 - Compliance with accounting standards;
 - Compliance with listing and legal requirements concerning financial statements;
- d) Reviewing, with the management and auditors, and the adequacy of internal control systems;
- e) Review and monitor the auditor's independence and performance, and effectiveness of audit process;
- f) Reviewing, with the management, the quarterly financial statements and auditor's report before submission to the Board for approval;
- g) Reviewing, with the management, the statement of uses/application of funds raised through an issue, the statement of funds utilized for purposes other than those stated in the offer document/prospectus/notice and the report submitted by the monitoring agency monitoring the utilisation of proceeds of a public or rights issue, and making appropriate recommendations to the board to take up steps in this matter;
- h) Approval or any subsequent modification of transactions of the listed entity with related parties;
- i) Scrutiny of inter-corporate loans and investments;
- j) Valuation of undertakings or assets of the listed entity, wherever it is necessary;
- k) Evaluation of internal financial controls and risk management systems;
- l) Discussion with statutory auditors before the audit commences, about the nature and scope of audit as well as post-audit discussion to ascertain any area of concern;
- m) To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of non-payment of declared dividends) and creditors;
- n) To review the functioning of the whistle blower mechanism;
- o) Approval of the appointment of Chief Financial Officer after assessing the qualifications, experience and background, etc. of the candidate.
- p) Composition, name of members and Chairperson

NOMINATION AND REMUNERATION COMMITTEE:

The Company had constituted the Nomination and Remuneration Committee under section 178 of the Companies Act, 2013. The Nomination and Remuneration policy is annexed to this report.

(a) Composition, Meetings and Attendance during the year

The Nomination and remuneration committee comprises of Non-Executive cum Independent directors.

The committee comprises as follows:

Mr. Syed Khaleel Ahmed	Chairman
Mr. Sathaiah Bathula	Member
Mrs. Vijayalakshmi Panati	Member

Dates on which the Audit Committee Meetings were held	
Sl.No.	Date of Board Meeting
1	09.08.2019
2	20.08.2019
3	27.08.2019
4	03.03.2020

(b) Selection and Evaluation of Directors:

The company believes formal evaluation of the board and of the individual directors, on an annual basis, is a potentially effective way to respond to the demand for greater board accountability and effectiveness. For the company, evaluation provides an ongoing means for directors to assess their individual and collective performance and effectiveness. In addition to greater board accountability, evaluation of board members helps in;

- a. More effective board process
- b. Better collaboration and communication
- c. Greater clarity with regard to members roles and responsibilities
- d. Improved chairman – managing directors and board relations

The evaluation process covers the following aspects

- Self-evaluation of directors
- Evaluation of the performance and effectiveness of the board
- Evaluation of the performance and effectiveness of the committees
- Feedback from the non-executive directors to the chairman
- Feedback on management support to the board.

(c) Performance Evaluation of Board, Committees and Directors

The company believes formal evaluation of the board and of the individual directors, on an annual basis, is a potentially effective way to respond to the demand for greater board accountability and effectiveness. For the company, evaluation provides an ongoing means for directors to assess their individual and collective performance and effectiveness. In addition to greater board accountability, evaluation of board members helps in;

- a. More effective board process
- b. Better collaboration and communication
- c. Greater clarity with regard to member's roles and responsibilities
- d. Improved chairman – managing directors and board relations

The evaluation process covers the following aspects

- Self-evaluation of directors
- Evaluation of the performance and effectiveness of the board
- Evaluation of the performance and effectiveness of the committees
- Feedback from the non-executive directors to the chairman
- Feedback on management support to the board.

CORPORATE GOVERNANCE

As per Regulation 15 of SEBI (Listing Obligations and Disclosure Requirements), 2015, provisions relating to corporate governance are not applicable to your company and therefore, no separate report on corporate governance is required.

MANAGEMENT DISCUSSION & ANALYSIS

The Management Discussion and Analysis Report highlighting the industry structure and developments, opportunities and threats, future outlook, risks and concerns etc. is forms part of this report and the same is annexed herewith.

STATUTORY AUDITORS

In terms of Section 139 of the Companies Act, 2013 and the rules made thereunder, M/s. Ramesh Athasniya & Co., Chartered Accountants were appointed as Statutory auditors of the company at the 24th Annual General Meeting to hold office until the conclusion of the 28th Annual General Meeting of the Company.

However, Pursuant to notification issued by the Ministry of Corporate Affairs on 7th May, 2018 amending section 139 of the Companies Act, 2013 and the rules framed thereunder, the mandatory requirement for ratification of appointment of auditors by the members at every Annual General Meeting (AGM) has been omitted, and hence the company is not proposing an item on ratification of appointment of Auditors at this AGM.

REPLIES TO AUDITORS' REPORT

The Auditors' Report does not contain any qualification. Notes to Accounts and Auditors remarks in their report are self-explanatory and do not call for any further comments.

BUSINESS RESPONSIBILITY REPORT (BRR)

Securities Exchange Board of India (SEBI) vide circular CIR/CFD/DIL/8/2012 dated August 13, 2012 has mandated the inclusion of BRR as part of the Annual Report for the top 100 listed entities based on their market capitalization on Bombay Stock Exchange Ltd and National Stock Exchange of India Ltd as at 31 March 2012. In view of the requirements specified, the company is not mandated for the providing the BRR and hence do not form part of this Report.

SECRETARIAL AUDIT REPORT

In terms of Section 204 of the Act and Rules made there under, Mr. Ramesh Chandra Bagdi, Practicing Company Secretary has been appointed as Secretarial Auditor of the Company. The report of the Secretarial Auditor is enclosed as **Annexure - III** to this report.

Replies to Secretarial Auditors Report:

S.No.	Qualification	Management Response
1.	the Name of the company was formerly--“SEA GOLD AQUA FARMS LTD.” and the same name is prevailing in the record of the BSE vide scrip code 530361 but sofar changed and existing name of the company - SEA GOLD INFRASTRUCTURE LTD. has not been given effect by the BSE;	The Company has applied for Name change in the BSE database, but due to some mandatory requirements, it has kept hold.
2.	Company has not appointed Whole time Company Secretary as required under Section 203(ii) Act until 27.08.2019. However Company has appointed Ms. Riddhi Suresh Badiyani as Compliance Officer of the Company as on 27.08.2019	The Management has complied the same by appointing the Copmany Secretary as required by the CA, 2013 and SEBI LODR Regulations.
3.	Company has not appointed Chief Financial Officer as required under Section 203(iii) of Act until 09.08.2019. However Company has appointed Mr. Srinivas Jakkani as CFO of the Company as on 09.08.2019	The Management has complied the same by appointing the Chief Executive Officer as required by the SEBI LODR Regulations..
4.	(i) There was a delay in filing the following documents with the statutory authorities: • Filing of Various Forms with ROC • Filing of Shareholding Pattern as on 31.03.2019 • Filing of Shareholding Pattern as on 30.06.2020 • Filing of Statement of Investor Complaints for Quarter ending 30.06.2019 • Submission of Financial Results for Quarter ending 31.03.2019	Unfortunately there was some delayed in compliance of the same as there was scarcity in the manpower.
5.	The Company had received Notices from the Bombay Stock Exchange levying a penalty of Rs.15,00,000 approx. for Non - Complying with various provisions of SEBI(LODR), Regulations 2015	The Company shall pay the same shortly and ensure due compliance within the timelines.
6.	Company has not appointed Internal Auditor as required under Companies (Accounts) Rules, 2014.	The Company has appointed M/s. S R Kumar & Associates as Internal Auditors but due to some inadvertent situations MGT-14 have not been filed and the Company shall ensure due compliance within the statutory timelines.

COST AUDITORS

The provisions of Section 148 of the Companies Act, 2013 relating to mandatory Cost Audit does not apply to the Company and hence, Cost Audit is not mandated. However, the Company is required to maintain Cost records which the Company is maintaining.

CORPORATE SOCIAL RESPONSIBILITY

The provisions w.r.t. CSR are not applicable to the Company. Therefore, the Company had not constituted CSR committee during the year 2019-20.

PARTICULARS OF LOANS, GUARANTEES AND INVESTMENTS

Details of loans and guarantees given and investments made under Section 186 of the Act are provided in the Notes to the Financial Statements.

WHISTLE BLOWER POLICY/VIGIL MECHANISM

Pursuant to the provisions of section 177(9) & (10) of the Companies Act, 2013 and the rules framed there under and pursuant to the applicable provision of Clause 49 of the listing agreement entered with stock exchanges, the company has established a mechanism through which all stake holders can report the suspected frauds and genuine grievances to the appropriate authority. The Whistle blower policy which has been approved by the board of directors of the company has been hosted on the website of the company viz., www.seagoldaqua.com

SECRETARIAL STANDARDS

The Company has complied with all applicable Secretarial Standards for the Financial Year 2019-20

PREVENTION OF INSIDER TRADING

The Company has adopted a Code of Conduct for Prevention of Insider Trading with a view to regulate trading in securities by the Directors and designated employees of the Company. The Code requires pre-clearance for dealing in the Company's shares and prohibits the purchase or sale of Company shares by the Directors and the designated employees while in possession of unpublished price sensitive information in relation to the Company and during the period when the Trading Window is closed. The 'Manager' is responsible for implementation of the Code along with the management of the Company.

Members of the Board have confirmed compliance with the Code.

RISK MANAGEMENT POLICY

The Board of Directors has formed a risk management committee to identify, evaluate, mitigate and monitor the risks associated with the business carried by the company. The committee reviews the risk management plan and ensures its effectiveness. A mechanism has been put in place which will be reviewed on regular intervals.

POLICY ON SEXUAL HARASSMENT

The Company has adopted policy on Prevention of Sexual Harassment of Women at Workplace in accordance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. During the financial year ended 31st March, 2020, the Company has not received any complaints pertaining to Sexual Harassment.

PARTICULARS OF CONTRACTS OR ARRANGEMENTS WITH RELATED PARTIES

All the related party transactions that were entered during the financial years were in the ordinary course of business of the company and were on arm length basis. There were no materially significant related party transactions entered by the company during the year with the promoters, directors, key managerial personnel or other persons which may have a potential conflict with the interest of the company.

The policy on related party transactions as approved by the board of directors is hosted on the website of the company viz., www.seagoldaqua.com

Particulars of every contract or arrangements entered into by the Company with related parties referred to in sub-section (1) of section 188 of the Companies Act, 2013 including certain arm's length transactions under third proviso thereto shall be disclosed in **Form No. AOC-2 as 'Annexure I'** to this report

DETAILS OF SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS OR COURTS OR TRIBUNALS IMPACTING THE GOING CONCERN STATUS AND COMPANY'S OPERATIONS IN FUTURE

No significant and material order has been passed by the regulators, courts, tribunals impacting the going concern status and Company's operations in future.

PUBLIC DEPOSITS

Your Company has not accepted any deposits from the public under Chapter V of the Act or under the corresponding provisions of Section 73 and 74 of the Companies Act, 2013. As such, there was no principal or interest outstanding on the date of the Balance Sheet.

PARTICULARS OF EMPLOYEES

A table containing the particulars in accordance with the provisions of Section 197(12) of the Act, read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, is appended as ‘**Annexure II**’ to this Report.

In terms of Section 136 of the Companies Act, 2013 the same is open for inspection at the Registered Office of the Company.

Copies of this statement may be obtained by the members by writing to the Company Secretary at the Registered Office of the Company.

The ratio of the remuneration of each Director to the median employee’s remuneration and other details in terms of Section 197(12) of the Companies Act, 2013 read with Rule 5 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, are enclosed in ‘**Annexure III**’ and forms part of this Report.

EXTRACT OF THE ANNUAL RETURN

In accordance with Section 134 (3) (a) of the Act, an extract of the Annual Return in the prescribed format is appended as ‘**Annexure IV**’ to this Report.

DETAILS OF SUBSIDIARY, JOINT VENTURE OR ASSOCIATE COMPANIES

The Company does not have any Subsidiary, Joint Venture or an Associate Company.

PARTICULARS OF CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO

(A) CONSERVATION OF ENERGY

(i)	the steps taken or impact on conservation of energy	Nil
(ii)	the steps taken by the company for utilizing alternate sources of energy	Nil
(iii)	the capital investment on energy conservation equipments	Nil

(B) TECHNOLOGY ABSORPTION

(i)	the efforts made towards technology absorption	The Company has neither absorbed nor adopted any new technology. The company has also not made any innovation in technology other than the
-----	--	--

		R&D
(ii)	the benefits derived like product improvement, cost reduction, product development or import substitution	No benefits derived in the year under review
(iii)	in case of imported technology (imported during the last three years reckoned from the beginning of the financial year)-	No new technology is imported during the last three years
	(a) the details of technology imported	--
	(b) the year of import;	--
	(c) whether the technology been fully absorbed	--
	(d) if not fully absorbed, areas where absorption has not taken place, and the reasons thereof	--
(iv)	the expenditure incurred on Research and Development	No expenditure incurred on Research and Development

Conservation of Energy which is an ongoing process in the Company's construction activities and the same is not furnished as the relative rule is not applicable to your company.

There is no information to be furnished regarding Technology Absorption as your company has not undertaken any research and development activity in any manufacturing activity nor any specific technology is obtained from any external sources which needs to be absorbed or adapted.

Innovation is a culture in the Company to achieve cost efficiency in the construction activity so as to be more competitive in the prevailing environment.

FOREIGN EXCHANGE EARNINGS AND OUTGO

In accordance with the provisions of Section 134 of the Companies Act, 2013, read with the Companies (Disclosure of Particulars in the Report of Board of Directors) Rules, 1988, the information relating to foreign exchange earnings and outgo during the year in terms of actual outflows is as follows:

Foreign Exchange Inflows: **NIL**

Foreign Exchange Outflows: **NIL**

INTERNAL AUDIT & CONTROLS

The Company to engage M/s.S R Kumar & Associates, Chartered Accountants, as its Internal Auditor of the Company for the financial year 2019-20 and their report is reviewed by the Audit

Committee from time to time. During the year, the Company continued to implement their suggestions and recommendations to improve the control environment. Their scope of work includes review of processes for safeguarding the assets of the Company, review of operational efficiency, effectiveness of systems and processes, and assessing the internal control strengths in all areas. Internal Auditors findings are discussed with the process owners and suitable corrective actions taken as per the directions of Audit Committee on an ongoing basis to improve efficiency in operations.

INTERNAL FINANCIAL CONTROL SYSTEMS

The Company has adequate Internal Financial Controls consistent with the nature of business and size of the operations, to effectively provide for safety of its assets, reliability of financial transactions with adequate checks and balances, adherence to applicable statutes, accounting policies, approval procedures and to ensure optimum use of available resources. These systems are reviewed and improved on a regular basis. It has a comprehensive budgetary control system to monitor revenue and expenditure against approved budget on an ongoing basis.

MANAGEMENT REPLIES TO AUDITORS REPORT – STANDALONE FINANCIAL REPORTS:

With reference to observations made in Auditor's Report, the notes of account are self-explanatory and therefore do not call for any further comments. The Auditors' Report does not contain any qualification. The results for the year ended March 31, 2020 have been subjected to an audit by the Statutory Auditors of the Company and a qualified report has been issued by them thereon.

INDUSTRIAL RELATIONS

The company enjoyed cordial relations with its employees during the year under review and the Board appreciates the employees across the cadres for their dedicated service to the Company, and looks forward to their continued support and higher level of productivity for achieving the targets set for the future.

LISTING WITH STOCK EXCHANGES:

The Securities Exchange Board of India (SEBI), on 02 nd September 2015, has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with an aim to consolidate and streamline the provisions of Listing Agreement for different segments of capital market to ensure better enforceability. The said regulations were effective from 1st December, 2015.

Accordingly, all listed entities were required to enter into the Listing Agreement within 6 months from the effective date. The Company entered into Listing Agreement with the BSE Limited.

The Company confirms that it has paid the Annual Listing Fees for the year 2019-20 to BSE where the Company's Shares are listed.

HUMAN RESOURCES:

Your Company treats its "human resources" as one of its most important assets.

Your Company continuously invests in attraction, retention and development of talent on an ongoing basis. A number of programs that provide focused people attention are currently underway. Your Company thrust is on the promotion of talent internally through job rotation and job enlargement.

ACKNOWLEDGEMENTS

Your Directors wish to express their appreciation of the support and co-operation of the Central and the State Government, bankers, financial institutions, suppliers, associates and subcontractors and seeks their continued patronage in future as well.

for and on behalf of the Board
for Sea Gold Infrastructure Limited

Date : 02.09.2020	Sd/- Syed Khaleel Ahmed Director DIN: 05347153	Sd/- Vijayalakshmi Panati Managing Director DIN: 06635011
Place : Hyderabad		

Annexure - I**FORM NO. AOC – 2**

Form for disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub-section (1) of section 188 of the Companies Act, 2013 including certain arm's length transactions under third proviso thereto (Pursuant to clause (h) of sub-section (3) of section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014.

1. Details of contracts or arrangements or transactions not at Arm's length basis.

Sl. No.	Particulars	Details
a)	Name (s) of the related party & nature of relationship	NIL
b)	Nature of contracts/arrangements/transaction	
c)	Duration of the contracts/arrangements/transaction	
d)	Salient terms of the contracts or arrangements or transaction including the value, if any	
e)	Justification for entering into such contracts or arrangements or transactions'	
f)	Date of approval by the Board	
g)	Amount paid as advances, if any	
h)	Date on which the special resolution was passed in General meeting as required under first proviso to section 188	

2. Details of contracts or arrangements or transactions at Arm's length basis.

SL. No.	Particulars	Details
a)	Name (s) of the related party & nature of relationship	NIL
b)	Nature of contracts/arrangements/transaction	
c)	Duration of the contracts/arrangements/transaction	
d)	Salient terms of the contracts or arrangements or transaction including the value, if any	
e)	Date of approval by the Board	
f)	Amount paid as advances, if any	

for and on behalf of the Board
for Sea Gold Infrastructure Limited

Date : 02.09.2020
Place : Hyderabad

Sd/-
Syed Khaleel Ahmed
Director
DIN: 05347153

Sd/-
Vijayalakshmi Panati
Managing Director
DIN: 06635011

Annexure - II

STATEMENT OF PARTICULARS AS PER RULE 5 OF COMPANIES (APPOINTMENT AND REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014

- (i) The ratio of the remuneration of each director to the median remuneration of the employees of the company for the financial year

Sl.No	Name of the Director	Ratio of the remuneration to the median remuneration of the employees
1.	Mr. Rajasekhar Mathuru Reddy	Nil
2.	Mr. Syed Khaleel Ahmed	Nil
3.	Mrs. Vijayalakshmi Panati	Nil
4.	Mr. Sathaiah Bathula	Nil

- (ii) The percentage increase in remuneration of each Director, Chief Financial Officer, Chief Executive Officer, Company Secretary or Manager in the financial year:

Sl.No	Name of the Director	Ratio of the remuneration to the median remuneration of the employees
1.	Mr. Rajasekhar Mathuru Reddy	Nil
2.	Mr. Syed Khaleel Ahmed	Nil
3.	Ms. Vijayalakshmi Panati	Nil
4.	Mr. Sathaiah Bathula	Nil

- (iii) The percentage increase in the median remuneration of employees in the financial year 2019-20 is: Nil
- (iv) The number of permanent employees on the rolls of Company: 10 employees
- (v) No Remuneration is being paid to the directors.
- (vi) Variations in the market capitalization of the company, price earnings ratio as at the closing date of the current financial year and previous financial year and percentage increase over decrease in the market quotations of the shares of the company in comparison to the rate at which the company came out with the last public offer:

S.No	Particular	As at March 31, 2020	As at March 31, 2019
1.	Market Capitalisation	5,44,82,400	5,44,82,400
2.	Price Earnings Ratio	-	-

Market quotations of the shares of the Company in comparison to the rate at which the Company came out with the last public offer:

The Company made an Initial Public Offer in the year 1995 at a price of 10/- per equity share (at par). As on 31st March, 2020 the Market Quotation for the Company's Equity Shares of Rs.12.50/- each (Closing Price) is Rs.12.50/-.

- (vii) Average percentile increases already made in the salaries of employees other than the managerial personnel in the last financial year and its comparison with the percentile increase in the managerial remuneration and justification thereof and point out if there are any exceptional circumstances for increase in the managerial remuneration.

Average percentile increases in the salaries of the employees other than the managerial personnel in the last financial year is 10% and there has been no increase in the managerial remuneration during the last financial year.

- (viii) Comparison of the remuneration of each of the Key Managerial Personnel against the performance of the Company.

(Rs.)

Sl. No.	Name	Remuneration of Key Managerial Personnel (Incl. Commission)	Profit after Tax for the year ended 31st March, 2020	Remuneration of KMP (as % of PAT)
1.	Mr. Vijayalakshmi Panati, Managing Director	Nil	(20,87,291)	Nil

- (ix) The key parameters for any variable component of remuneration availed by the directors: NA
- (x) The ratio of the remuneration of the highest paid director to that of the employees who are not Directors but receive remuneration in excess of the highest paid director during the year. -N.A.-
- (xi) The Remuneration paid to Key Managerial Personnel is as per the Remuneration Policy of the Company
- (xii) The particulars of the employees who are covered by the provisions contained in Rule 5(2) and rule 5(3) of Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014: NIL

for and on behalf of the Board
for Sea Gold Infrastructure Limited

Sd/-
Syed Khaleel Ahmed
Director
Date : 02.09.2020
Place : Hyderabad
DIN: 05347153

Sd/-
Vijayalakshmi Panati
Managing Director
DIN: 06635011

Information under Section 197 (12) of the Companies Act, 2013 read with the rule 5(2) Companies (Appointment and remuneration of managerial personnel) Rules, 2014 and forming part of Directors Report for the year ended March 31, 20120

Employed throughout the Financial Year and in receipt of remuneration aggregating Rs 60,00,000 or more								
Name of the Employee	Designation	Remuneration (in Rs.)	Qualification	Experience (years)	Date of Commencement of Employment	Age	Last employment held before joining the company	% of equity shares held in the Company
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Employees for part of the Financial Year who were in receipt of remuneration aggregating Rs 60,00,000 or more								
Name of the Employee	Designation	Remuneration (in Rs.)	Qualification	Experience (years)	Date of Commencement of Employment	Age	Last employment held before joining the company	% of equity shares held in the Company
---	---	---	---	---	---	---	---	---

- None of the employees is a relative of any Director of the company.

RAMESH CHANDRA BAGDI & ASSOCIATES

COMPANY SECRETARIES

31, SHRADDHANAND MARG, CHHAWANI, INDORE(MP)-452001

Email : rcbagdipcs@yahoo.in Mobile - 9827244043

Form No. MR-3

SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED March 31, 2020

[Pursuant to section 204(1) of the Companies Act, 2013 and Rule No. 9 of the Companies (Appointment and Remuneration Personnel) Rules, 2014]

To,
The Members,
Sea Gold Infrastructure Limited
Plot No. 270E/A, MCH No. 985,
Road No. 10, Jubilee Hills,
Hyderabad(TG)-500033

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **Sea Gold Infrastructure Limited** (hereinafter called the "**Company**"). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of Secretarial Audit, I hereby report that in my opinion, the Company has during the audit period covering the financial year ended on **March 31, 2020**, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on March 31, 2020 according to the provisions of:

- (1) The Companies Act, 2013 (the "Act") and the rules made there under and other applicable provisions of the Companies Act, 1956 which are still in force;
- (2) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under;
- (3) The Depositories Act, 1996 and the Regulations and Bye-laws framed under that Act;
- (4) Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings; - **Not Applicable to the Company during the Audit period**



(5) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):

- a. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- b. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- c. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009; - ***Not Applicable to the Company during the Audit period***
- d. The Securities and Exchange Board of India (Share Based Employee Benefit) Regulations, 2014; - ***Not Applicable to the Company during the Audit period***
- e. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - ***Not Applicable to the Company during the Audit period***
- f. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with Client;
- g. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; - ***Not Applicable to the Company during the Audit period***
- h. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998; - ***Not Applicable to the Company during the Audit period***
- i. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

(6) Other laws applicable to the Company as per the representations made by the Management

I have also examined compliance with the applicable clauses of the Secretarial Standards issued by The Institute of Company Secretaries of India with regard to holding of AGM/ BOD meetings. *The company could not complied with secretarial standards as regards meetings of board of directors due to urgency of board meetings in certain cases.*

I have also examined compliance with the provisions of LODR, 2015.

During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above subject to the following observations:

(i) Internal Complaints committee not constituted as mandated under Sexual Harrassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013;

(ii) the Company has not filed Form MGT-14 for:

- a. Approval of audited financial statements of the Company;
- b. Appointment of internal auditor and secretarial auditor;



(iii) the name of the company was formerly – 'SEA GOLD AQUA FARMS LTD.' and the same name is prevailing in the record of the BSE vide scrip code 530361 but so far changed and existing name of the company - SEA GOLD INFRASTRUCTURE LTD. has not been given effect by the BSE;

I further report that:

- The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.
- Adequate notice is given to all directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.
- As per the minutes of the meetings duly recorded and signed by the Chairman, the decisions of the Board were carried out unanimously.

I further report that there are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

I report further that, during the audit period, there were no specific events/actions in pursuance of the above referred laws, rules, regulations, guidelines, standards etc., having a major bearing on the Company's affairs.

For RAMESH CHANDRA BAGDI & ASSOCIATES,
COMPANY SECRETARIES,

R. C. Bagdi



(CS RAMESH CHANDRA BAGDI)
PROPRIETOR

FCS: 8276

C.P. No.: 2871

INDORE

DATED : 07/12/2020

UDIN – F008276B001423987

This report is to be read with our letter of even date which is annexed as 'Annexure A' and forms an integral part of this report.

‘ANNEXURE A’

To,
The Members,
Sea Gold Infrastructure Limited
Plot No. 270E/A, MCH No. 985,
Road No. 10, Jubilee Hills,
Hyderabad(TG)-500033

My report of even date is to be read along with this letter.

1. Maintenance of secretarial record is the responsibility of the management of the company. My responsibility is to express an opinion on these secretarial records based on our audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for our opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the company.
4. Where ever required, I have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of procedures on test basis.
6. The Secretarial Audit report is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.

For RAMESH CHANDRA BAGDI & ASSOCIATES,
COMPANY SECRETARIES,



(CS RAMESH CHANDRA BAGDI)
PROPRIETOR
FCS: 8276
C.P. No.: 2871
INDORE
DATED : 07/12/2020
UDIN – F008276B001423987

MANAGEMENT DISCUSSION & ANALYSIS REPORT

1. FORWARD-LOOKING STATEMENTS

This report contains forward-looking statements based on certain assumptions and expectations of future events. The Company, therefore, cannot guarantee that these assumptions and expectations are accurate or will be realized. The Company's actual results, performance or achievements can thus differ materially from those projected in any such forward-looking statements. The Company assumes no responsibility to publicly amend, modify or revise any forward-looking statements, on the basis of any subsequent developments, information or events.

2. INDUSTRY STRUCTURES & DEVELOPMENTS

The National Infrastructure Industry is expected to kick start and accelerate, leading to more transportation of materials. This in turn should help in the demand for cost effective retreading products. We are confident that we would be able to increase our market share in the retread industry.

3. OPPORTUNITIES & THREATS

The Company has taken up its new business activities and is committed for strong and consistent growth in the year to come. Owing to the nature of the industry the Company operates in, it is exposed to variety of risk factors which are broadly categorized into financial, technical, construction, policy and political, market and legal.

4. OUTLOOK:

In order to meet the changing market realities, your Company has been following the philosophy of providing the highest quality products and services at the lowest possible prices. All endeavors are made to achieve possible cost reduction in every area of operations. Your Company's philosophy to provide high class quality products i.e. full value for money, to consumers would greatly benefit in the long run. In the otherwise increasing cost arena, every expense, whether capital or revenue is minutely reviewed to achieve all possible savings.

5. RISKS AND CONCERNS:

The Company has a robust Risk Management process in place, which is a holistic, integrated and structured approach to manage risks with the objective of maximizing shareholders' value.

The risk management process at our Company broadly consists of identification, assessment, mitigation, prioritization and monitoring of risks with the following objectives:

- Enhance confidence in achieving its desired goals and objectives;
- Effectively restrain threats to acceptable levels;
- Take informed decisions about exploiting opportunities;

6. INTERNAL CONTROL SYSTEMS

The Company has proper and adequate systems of internal controls in order to ensure that all assets are safeguarded against loss from unauthorized use of disposition and that all transactions are authorized recorded and reported correctly. An Audit Committee headed by a non-executive independent Director is in place to review various areas of the control systems.

7. DISCUSSION OF FINANCIAL PERFORMANCE WITH RESPECT TO OPERATIONAL PERFORMANCE:

The details of the financial performance of the Company are appearing in the Balance Sheet, Profit & Loss Account and other financial statements etc. appearing separately. Highlights for the year 2019-20 are as under:

Sales for the year 2019-2020	Nil
Provision for taxation	(445)
Profit / Loss after tax	(20,87,291)
Paid up equity share capital as on 31 st March, 2020	5,44,82,400

The financial performance of the Company has been explained in the Directors' Report of the Company for the year 2019-20 appearing separately.

8. HUMAN RESOURCES:

During the year under review, the Company has undertaken extensive steps in optimizing the man power at the Plant, corporate office and Field locations. Employee/employer relations were cordial throughout the year. Measures for safety of the employees, training and development continued to receive top priorities.

9. CAUTIONARY STATEMENT:

Certain statements in the Management Discussion and Analysis describing the Company's views about the industry, expectations/predictions, objectives etc, may be

forward looking within the meaning of applicable laws and regulations. Actual results may differ materially from those expressed in the statement. Company's operations may inter-alia affect with the supply and demand situations, input prices and their availability, changes in Government regulations, tax laws and other factors such as Industrial relations and economic developments etc. Investors should bear the above in mind.

Annexure IV

**FORM NO. MGT 9
EXTRACT OF ANNUAL RETURN
as on financial year ended on March 31st, 2020**

[Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1) of the Company (Management & Administration) Rules, 2014]

I. REGISTRATION & OTHER DETAILS:

1.	CIN	L70200TG1993PLC016389
2.	Registration Date	05.10.1993
3.	Name of the Company	SEA GOLD INFRASTRUCTURE LIMITED
4.	Category/Sub-category of the Company	Company Limited by shares / Indian Non-Government Company
5.	Address of the Registered office & contact details	Plot No.23, Phase IV, IDA Jeedimetla, Hyderabad – 500 055, Telangana, India. Phone No. 040-23544558, Fax No. 040-23544558
6.	Whether listed company	Yes
7.	Name, Address & contact details of the Registrar & Transfer Agent, if any.	M/s Venture Capital and Corporate Investments Private Limited, H.No.12-10-167, Bharat Nagar, Hyderabad – 500 018 Tel No.: 040 – 23818475, Fax No.: 040 - 23868024

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY (All the business activities contributing 10 % or more of the total turnover of the company shall be stated)

S. No.	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
1	Infrastructure Activities	45201&45202	100%

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

S. No.	Name and Address of the Company	CIN/GLN	Holding/ subsidiary/ Associate	% of shares held	Applicable Section
NIL					

IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)

i) Category-wise Share Holding

Category of Shareholders	No. of Shares held at the end of the year [As on 31-March-2019]				No. of Shares held at the end of the year [As on 31-March-2020]				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(1) Indian									
a) Individual/ HUF	1271910	20000	1291910	23.71	1271910	20000	1291910	23.71	---
b) Central Govt	---	---	---	---	---	---	---	---	---
c) State Govt(s)	---	---	---	---	---	---	---	---	---
d) Bodies Corp.	2605000	---	2605000	47.81	2605000	---	2605000	47.81	---
e) Banks / FI	---	---	---	---	---	---	---	---	---
f) Any other	---	---	---	---	---	---	---	---	---
Sub-total(A) (1)	3876910	20000	3896910	71.53	3876910	20000	3896910	71.53	---
(2) Foreign									
a) NRIs – Individual	---	---	---	---	---	---	---	---	---
b) Other Individual	---	---	---	---	---	---	---	---	---
c) Bodies Corp	---	---	---	---	---	---	---	---	---

d) Banks / FI	---	---	---	---	---	---	---	---	---
e) Any Other	---	---	---	---	---	---	---	---	---
Sub-total(A) (2)	---	---	---	---	---	---	---	---	---
Total shareholding of Promoter (A)= (A) (1) + (A) (2)	3876910	20000	3896910	71.53	3876910	20000	3896910	71.53	---
B. Public Shareholding									
1. Institutions									
a) Mutual Funds	---	7410	7410	0.14	---	7410	7410	0.14	---
b) Banks / FI	---	50000	50000	0.92	---	50000	50000	0.92	---
c) Central Govt	---	---	---	---	---	---	---	---	---
d) State Govt(s)	---	---	---	---	---	---	---	---	---
e) Venture Capital Funds	---	---	---	---	---	---	---	---	---
f) Insurance Companies	---	---	---	---	---	---	---	---	---
g) FIIs	---	---	---	---	---	---	---	---	---
h) Foreign Venture Capital Funds	---	---	---	---	---	---	---	---	---
i) Others (specify)	---	---	---	---	---	---	---	---	---
Sub-total (B)(1):-	---	57410	57410	1.05	---	57410	57410	1.05	---
2. Non-Institutions									
a) Bodies Corp.									
i) Indian	500	88780	89280	1.64	500	88780	89280	1.64	---
ii) Overseas	---	---	---	---	---	---	---	---	---
b) Individuals									

i) Individual shareholders holding nominal share capital up to Rs.1 lakh	960	102460	103420	1.90	1170	102250	103420	1.90	---
ii) Individual shareholders holding nominal share capital in excess of Rs.1 lakh	762990	492050	1255040	23.04	762990	492050	1255040	23.04	---
c) Qualified Foreign Investor-Corporate	---	---	---	---	---	---	---	---	---
d) Clearing Member	---	---	---	---	---	---	---	---	---
e) Trust	---	---	---	---	---	---	---	---	---
f) NRI's	---	46180	46180	0.85	---	46180	46180	0.85	---
g) Foreign Bodies Corp	---	---	---	---	---	---	---	---	---
h) Foreign Nation	---	---	---	---	---	---	---	---	---
i) FPI- Individual	---	---	---	---	---	---	---	---	---
j) FPI- Corporate	---	---	---	---	---	---	---	---	---
K) Others (specify)	--	---	---	---	---	---	---	---	---
Sub-total (B)(2):	764450	729470	1493920	27.42	764660	729260	1493920	27.42	---
Total Public Shareholding (B)=(B) (1) + (B)(2)	764450	835350	1551330	28.47	764660	786670	1571330	28.47	---
C. Shares held by Custodian for GDRs & ADRs	---	---	---	---	---	---	---	---	---
Grand Total (A+B+C)	4641360	806880	5448240	100.00	4641570	806670	5448240	100.00	---

ii) Shareholding of Promoters

Sl. No.	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No. of Shares	% of total Shares of the company	%of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the company	%of Shares Pledged / encumbered to total shares	
1	P. Sanath Kumar	20000	0.37	0.00	20000	0.37	0.00	---
2	P V K Engineers Private Limited	2600000	47.72	0.00	2600000	47.72	0.00	---
3	P V K and P R K Technologies Private Limited	2500	0.05	0.00	2500	0.05	0.00	---
4	Anantha Power Projects Private Limited	2500	0.05	0.00	2500	0.05	0.00	---
5	J T V Satyanarayana Rao	37400	0.69	0.00	37400	0.69	0.00	---
6	Harshavardhan Pedakala	40010	0.73	0.00	40010	0.73	0.00	---
7	Radha Krishna Reddy Panati	573000	10.52	0.00	573000	10.52	0.00	---
8	Venkata Krishna Reddy Panati	516500	9.48	0.00	516500	9.48	0.00	---
9	Mathuru Rajasekhar Reddy	105000	1.93	0.00	105000	1.93	0.00	---
	Total	3896910	71.53	0.00	3896910	71.53	0.00	---

iii) Change in Promoters' Shareholding (please specify, if there is no change): No Change

iv) Shareholding Pattern of top ten Shareholders: (Other than Directors, Promoters and Holders of GDRs and ADRs):

SN	For Each of the Top 10 Shareholders	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1.	PVK ENGINEERS PRIVATE LIMITED				
	At the beginning of the year	2600000	47.72	2600000	47.72
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year (or on the date of separation, if separated during the year)	2600000	47.72	2600000	47.72
2.	RADHAKRISHNA REDDY PANATI				
	At the beginning of the year	573000	10.52	573000	10.52
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year (or on the date of separation, if separated during the year)	573000	10.52	573000	10.52
3.	VENKATAKRISHNA REDDY PANATI				
	At the beginning of the year	516500	9.48	516500	9.48
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year (or on the date of separation, if separated during the year)	516500	9.48	516500	9.48

4.	GUNDLAPALLY PRASAD				
	At the beginning of the year	142000	2.61	142000	2.61
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year (or on the date of separation, if separated during the year)	142000	2.61	142000	2.61
5.	SUDARSHAN REDDY VELAGALA				
	At the beginning of the year	120000	2.20	120000	2.20
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year (or on the date of separation, if separated during the year)	120000	2.20	120000	2.20
6.	MATHURU RAJASEKHAR REDDY				
	At the beginning of the year	105000	1.93	105000	1.93
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year (or on the date of separation, if separated during the year)	105000	1.93	105000	1.93
7.	RAJENDRA VARMA CHEKURI				
	At the beginning of the year	100000	1.83	100000	1.83
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year (or on the date of separation, if separated during the year)	100000	1.83	100000	1.83
8.	MUSUNURI AYYAPPA				
	At the beginning of the year	97000	1.78	97000	1.78
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL

	At the end of the year (or on the date of separation, if separated during the year)	97000	1.78	97000	1.78
9.	VARUN KOTTAM				
	At the beginning of the year	95000	1.74	95000	1.74
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year (or on the date of separation, if separated during the year)	95000	1.74	95000	1.74
10.	DAMODAR SRINIVASA RAO				
	At the beginning of the year	90000	1.65	90000	1.65
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year (or on the date of separation, if separated during the year)	90000	1.65	90000	1.65

v) Shareholding of Directors and Key Managerial Personnel:

SN	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1.	Venkata Krishna Reddy Panati				
	At the beginning of the year	516500	9.48	516500	9.48
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year	516500	9.48	516500	9.48

2.	Mathuru Rajasekhar Reddy				
	At the beginning of the year	105000	1.93	105000	1.93
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year	105000	1.93	105000	1.93
3.	Syed Khaleel Ahmed				
	At the beginning of the year	NIL	NIL	NIL	NIL
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year	NIL	NIL	NIL	NIL
4.	Vijayalakshmi Panati				
	At the beginning of the year	NIL	NIL	NIL	NIL
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year	NIL	NIL	NIL	NIL
5.	Sathaiah Bathula				
	At the beginning of the year	NIL	NIL	NIL	NIL
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	NIL	NIL	NIL	NIL
	At the end of the year				

V. INDEBTEDNESS -Indebtedness of the Company including interest outstanding/accrued but not due for payment.

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	NIL	621500	NIL	621500
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	NIL	NIL	NIL
Total (i+ii+iii)	NIL	621500	NIL	621500
Change in Indebtedness during the financial year	NIL	NIL	NIL	NIL
* Addition	NIL	NIL	NIL	NIL
* Reduction	NIL	621500	NIL	621500
Net Change	NIL	(621500)	NIL	(621500)
Indebtedness at the end of the financial year	NIL	NIL	NIL	NIL
i) Principal Amount	NIL	NIL	NIL	NIL
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	NIL	NIL	NIL
Total (i+ii+iii)	NIL	NIL	NIL	NIL

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

SN.	Particulars of Remuneration	Name of MD/WTD/ Manager	Total Amount
		Vijayalakshmi Panati	
		Managing Director	
1	Gross salary		
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	NIL	NIL
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	NIL	NIL
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	NIL	NIL
2	Stock Option	NIL	NIL
3	Sweat Equity	NIL	NIL
4	Commission - as % of profit - others, specify	NIL	NIL
5	Others, please specify	NIL	NIL
	Total (A)	NIL	NIL
	Ceiling as per the Act	NIL	NIL

B. Remuneration to other Directors

SN.	Particulars of Remuneration	Name of Directors		Total Amount
1	Independent Directors	Syed Khaleel Ahmed	Sathaiah Bathula	
	Fee for attending board committee meetings	NIL	NIL	NIL
	Commission	NIL	NIL	NIL
	Others, please specify	NIL	NIL	NIL
	Total (1)	NIL	NIL	NIL
2	Other Non-Executive Directors	Mathuru Rajasekhar Reddy		
	Fee for attending board committee meetings	NIL		
	Commission	NIL		
	Others, please specify	NIL		
	Total (2)	NIL		
	Total (B)=(1+2)	NIL		
	Total Managerial Remuneration	NIL	NIL	
	Overall Ceiling as per the Act	The act provides for paying sitting fees up to Rs 1,00,000 per meeting		

C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTB

SN	Particulars of Remuneration	Key Managerial Personnel			
		CEO	CS	CFO	Total
1	Gross salary	NIL	2,10,000	2,64,000	NIL
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	NIL	NIL	NIL	NIL
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	NIL	NIL	NIL	NIL
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	NIL	NIL	NIL	NIL
2	Stock Option	NIL	NIL	NIL	NIL
3	Sweat Equity	NIL	NIL	NIL	NIL
4	Commission	NIL	NIL	NIL	NIL
	- as % of profit	NIL	NIL	NIL	NIL
	others, specify	NIL	NIL	NIL	NIL
5	Others, please specify	NIL	NIL	NIL	NIL
	Total	NIL	2,10,000	2,64,000	NIL

VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
A. COMPANY					
Penalty	NOT APPLICABLE				
Punishment					
Compounding					
B. DIRECTORS					
Penalty	NOT APPLICABLE				
Punishment					
Compounding					
C. OTHER OFFICERS IN DEFAULT					
Penalty	NOT APPLICABLE				
Punishment					
Compounding					

for and on behalf of the Board
for Sea Gold Infrastructure Limited

Date : 02.09.2020
Place : Hyderabad

Sd/-
Syed Khaleel Ahmed
Director
DIN: 05347153

Sd/-
Vijayalakshmi Panati
Managing Director
DIN: 06635011

To

The Members of

M/s. SEA GOLD INFRASTRUCTURE LIMITED,
Hyderabad.**Report on the Audit of the Financial Statements:****Opinion**

We have audited the standalone financial statements of **M/s. SEA GOLD INFRASTRUCTURE LIMITED ("the Company")**, which comprise the balance sheet as at 31st March 2020, and the statement of Profit and Loss, (statement of changes in equity) and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies and other explanatory information.

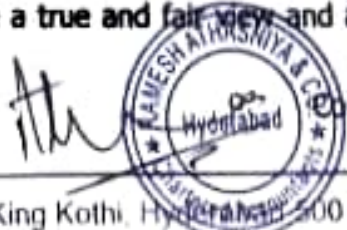
In our opinion and to the best of our information and according to the explanations given to us, the aforesaid financial statements give the information required by the Act in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2020, and profit/loss, changes in equity and its cash flows for the year ended on that date.

Basis for Opinion

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Companies Act, 2013. Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the Companies Act, 2013 and the Rules there under, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Management's Responsibility for the Financial Statements:

The Company's Management is responsible for the matters stated in section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation of these financial statements that give a true and fair view of the financial position, financial performance and cash flows of the Company in accordance with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014. This responsibility also includes maintenance of adequate accounting records in accordance with the provision of the Act for safeguarding the assets of the company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of internal financial control, that were operating effectively for ensuring the accuracy and completeness of accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.



Contd...2...

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

The Board of Directors are also responsible for overseeing the Company's financial reporting process.

Auditors' Responsibility:

Our objective is to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal financial controls relevant to the audit in order to design audit Procedures that is appropriate in the circumstances. Under section 143(3)(i) of the Act, We are also responsible for expressing our opinion on whether the Company has adequate internal financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists; we are required to draw attention in our audit report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our audit report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.



Contd...3...

- Materiality is the magnitude of misstatements in the financial statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the financial statements may be influenced. We consider quantitative materiality and qualitative factors in (i) planning the scope of our audit work and in evaluating the results of our work; and (ii) to evaluate the effect of any identified misstatements in the financial statements.
- We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.
- We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

Report on Other Legal and Regulatory Requirements:

1. As required by the Companies (Auditor's Report) Order, 2016 ("the Order") issued by the Central Government of India in terms of sub-section (1) of section 143 of the Act, we give in the "Annexure A" a statement on the matters specified in paragraphs 3 and 4 of the Order, to the extent applicable.

As required by Section 143(3) of the Act, based on our audit we report that:

- (a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
- (b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
- (c) The Balance Sheet, the Statement of Profit and Loss Statement dealt with by this Report are in agreement with the relevant books of account.
- (d) In our opinion, the aforesaid financial statements comply with the AS specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.
- (e) On the basis of the written representations received from the directors as on March 31, 2020 taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2020 from being appointed as a director in terms of Section 164 (2) of the Act.
- (f) With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure B".



Contd...4..

- (g) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, as amended in our opinion and to the best of our information and according to the explanations given to us:
- (i) The Company has no pending litigations which impacts the financial position of the company.
 - (ii) The Company does not have any long term contracts including derivative contracts for which there were any material foreseeable losses.
 - (iii) There were no amounts required to be transferred to the Investor Education and Protection fund by the company.

For RAMESH ATHASNIYA & COMPANY,
Chartered Accountants,



CA. RAMESH ATHASNIYA,
Partner.

M.No. 204976

Firm Reg No.007480S

Date : 31st July, 2020.

Place : Hyderabad.

UDIN : 20204976AAAADW3526

- (i). (a) The Company has maintained proper records showing full particulars, including quantitative details and situation of fixed assets.
- (b) During the year the management has carried out physical verification of fixed assets. No material discrepancies were noticed on such verification.
- (c) According to the information and explanations given to us and on the basis of our examination of the records of the Company, no immovable properties are held in the name of the company.
- (ii). In our opinion and according to the information and explanations made available to us the management has conducted physical verification of inventory at reasonable intervals.
- (iii). (a) In our opinion and according to the information and explanations given to us, the company has not granted any loans to the parties covered in the register maintained under section 189 of the Act.
- (b) As there are no loans granted to the parties covered in the register maintained under Section 189 of the Act, the comment on overdue loans is not applicable.
- (iv). As the company has not granted any loans or guarantees or securities, the compliance of section 185 and 186 of the Companies Act, 2013 is not applicable to the company. Thus, paragraph 3 (iv) of the Order is not applicable to the company.
- (v). In our opinion and according to the information and explanations given to us, during the course of our audit, the company has not accepted deposits, as per the directives issued by the Reserve Bank of India and the provisions of sections 73 to 76 or any other relevant provisions of the Companies Act and the rules framed there under. Therefore, the provisions of Clause (v) of paragraph 3 of the CARO 2016 is not applicable to the Company.
- (vi). We have been informed that the Central Government has prescribed for the maintenance of Cost records under Section 148(1)(d) of the Companies Act, 2013, as per the information made available to us the company is prima facie maintaining such records. However, we are not required to conduct a detailed examination of the same.
- (vii). (a) In our opinion and according to the information and explanations made available to us the company is generally regular in depositing all the statutory dues with the appropriate authorities, Except TDS payable for the financial year 2015-16 amounting to Rs.1,01,637/-.
- (b) According to the information and explanations given to us, there are no instances where the tax is not deposited on account of any dispute.



Contd...2...

- (viii). Based on our audit procedures and according to the information and explanations given to us, we are of the opinion that the Company has not accepted any loans from financial institutions and banks. Hence this clause is not applicable.
- (ix). The Company did not raise any money by way of initial public offer or further public offer (including debt instruments) during the year and the term loans raised during the year have been utilized for the purpose for which they were raised.
- (x). According to the information and explanations given to us, no material fraud by the Company or on the Company by its officers or employees has been noticed or reported during the course of our audit.
- (xi). The provisions of Section 197 of the Companies Act, 2013 are not applicable to this company hence, the paragraph 3(xi) of the Order is not applicable.
- (xii). In our opinion and according to the information and explanations given to us, the Company is not a Nidhi Company. Accordingly, paragraph 3(xii) of the Order is not applicable.
- (xiii). According to the information and explanations given to us and based on our examination of the records of the Company, transactions with related parties are in compliance with Section 188 of the Companies Act, 2013 wherever applicable and details of such transactions have been disclosed in the financial statements as required by the applicable accounting standards.
- (xiv). According to the information and explanations given to us and based on our examination of the records of the Company, the Company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year.
- (xv). According to the information and explanations given to us and based on our examination of the records of the Company, the Company has not entered into non-cash transactions with directors or persons connected with him. Accordingly, paragraph 3(xv) of the Order is not applicable.
- (xvi). The Company is not required to be registered under Section 45-IA of the Reserve Bank of India Act, 1934.

For RAMESH ATHASNIYA & COMPANY,
Chartered Accountants,



CA. RAMESH ATHASNIYA,

Partner,

M.No. 204976

Firm Reg No.007480S

PLACE: Hyderabad,

DATE : 31st July, 2020.

Annexure - B to the Independent Auditors' Report of even date on the Standalone Financial Statements of M/s SEA GOLD INFRASTRUCTURE LIMITED Report on the Internal Financial Controls under Clause (i) of Sub-Section 3 of Section 143 of the Companies Act, 2013 ("the Act")

We have audited the internal financial controls over financial reporting of **M/s SEA GOLD INFRASTRUCTURE LIMITED** ("the Company") as of March 31, 2020 in conjunction with our audit of the standalone financial statements of the Company for the year ended on that date.

Management's Responsibility for Internal Financial Controls

The Company's management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls over Financial Reporting issued by the Institute of Chartered Accountants of India ("ICAI"). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

Auditors' Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls over Financial Reporting (the "Guidance Note") and the Standards on Auditing, issued by ICAI and deemed to be prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the Institute of Chartered Accountants of India. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

Our audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting.



Contd...2...

Meaning of Internal Financial Controls over Financial Reporting

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and (3) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

Inherent Limitations of Internal Financial Controls Over Financial Reporting

Because of the inherent limitations of internal financial controls over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may occur and not be detected. Also, projections of any evaluation of the internal financial controls over financial reporting to future periods are subject to the risk that the internal financial control over financial reporting may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at March 31, 2020, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

For **RAMESH ATHASNIYA & COMPANY,**
Chartered Accountants,



CA. RAMESH ATHASNIYA,
Partner.

M.No. 204976

Firm Reg No.007480S

Place : Hyderabad,

Date : 31st July, 2020.

UDIN : 20204976AAAADW3526

SEA GOLD INFRASTRUCTURE LIMITED

(CIN:L70200TG1993PLC016389)

Registered Office : Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

BALANCE SHEET AS AT 31-03-2020

PARTICULARS	Note Number	Figures as at the end of 31-03-2020		Figures as at the end of 31-03-2019	
ASSETS:					
A. Non Current Assets					
(a) Property, Plant and Equipment	2.01	147351		161583	
(b) Capital Work In Progress		25000000		25000000	
(c) Financial Assets					
(i) Investments		-Nil-		-Nil-	
(ii) Trade Receivables		-Nil-		-Nil-	
(iii) Loans		-Nil-		-Nil-	
(d) Deferred Tax Assets (Net)		-Nil-		-Nil-	
(e) Other Non Current Assets		-Nil-		-Nil-	
			25147351		25161583
B. Current Assets					
(a) Inventories		-Nil-		-Nil-	
(b) Financial Assets					
(i) Investments		-Nil-		-Nil-	
(ii) Trade Receivables	2.02	2417341		2417341	
(iii) Cash & Cash Equivalents	2.03	195667		124529	
(iv) Loans	2.04	16280616		16479016	
(v) Others (to be specified)	2.05	1117810		1131310	
			20011434		20152195
TOTAL ASSETS			45158785		45313778
EQUITY AND LIABILITIES:					
A. Equity					
(a) Equity Share Capital	2.06	54482400		54482400	
(b) Other Equity		(13902382)		(11815090)	
			40580018		42667310
B. Non Current Liabilities					
(a) Financial Liabilities					
(i) Borrowings	2.07	-Nil-		621500	
(ii) Trade Payables		-Nil-		-Nil-	
(iii) Other Financial Liabilities		-Nil-		-Nil-	
(b) Provisions		-Nil-		-Nil-	
(c) Deferred Tax Liabilities (Net)	2.08	18766		18321	
(d) Other Non Current Liabilities		-Nil-		-Nil-	
			18766		639821
B. Current Liabilities					
(a) Financial Liabilities					
(i) Borrowings		-Nil-		-Nil-	
(ii) Trade Payables		-Nil-		-Nil-	
(iii) Other Financial Liabilities		-Nil-		-Nil-	
(b) Other Current Liabilities	2.09	4560000		2006647	
(c) Provisions	2.10	-Nil-		-Nil-	
(d) Current Tax Liabilities (Net)		-Nil-		-Nil-	
			4560000		2006647
TOTAL EQUITY AND LIABILITIES			45158785		45313778
Significant Accounting Policies and Notes to Accounts	1 & 2				

As per our Report of even date,
for **RAMESH ATHASNIYA & COMPANY,**
Chartered Accountants,

CA. RAMESH ATHASNIYA,
Partner.
M.No. 204976
Firm Regn No.0074805

Place : Hyderabad,
Date : 31st July, 2020.

By Order of the Board,

P. Vijaya Lakshmi

Vijaya Lakshmi Panati
Managing Director.
(DIN: 06635011)

[Signature]
Syed Khaleel Ahmed
Director.
(DIN: 05347153)



SEA GOLD INFRASTRUCTURE LIMITED

(CIN:L70200TG1993PLC016389)

Registered Office : Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

STATEMENT OF PROFIT & LOSS FOR THE PERIOD ENDED ON 31-03-2020

(Amount in Rupees)

PARTICULARS	Note Number	Figures for the current 31-03-2020	Figures for the previous 31-03-2019
I. Revenue from Operations	2.11	-Nil-	-Nil-
II. Other Income	2.12	-Nil-	-Nil-
III. Total Revenue (I + II)		-Nil-	-Nil-
IV. Expenses:			
Cost of Materials Consumed		-Nil-	-Nil-
Purchases of Stock in Trade		-Nil-	-Nil-
Changes in inventories of Finished goods		-Nil-	-Nil-
Employee Benefits Expenses	2.13	384000	266100
Finance cost		-Nil-	-Nil-
Depreciation & Amortization Expense	2.01	14232	14230
Other Expenses	2.14	1688614	543053
Total Expenses		2086846	823383
V. Profit Before Tax (III-IV)		(2086846)	(823383)
VI. Tax Expense:			
(1) Current Tax		-Nil-	-Nil-
(2) Deferred Tax		445	1302
VII. Profit for the period		(2087291)	(824685)
VIII. Profit for the period		(2087291)	(824685)
IX. Other Comprehensive Income (OCI)		-Nil-	-Nil-
(1) Items that will not be reclassified to profit or loss			
(2) Items that will be reclassified to profit or loss			
X. Total Comprehensive Income		(2087291)	(824685)
XI. Earnings Per Share (for Continuing Operations)			
Basic		(0.38)	(0.15)
Diluted		(0.38)	(0.15)
XII. Number of Shares used for EPS working			
Basic		5448240	5448240
Diluted		5448240	5448240
Significant Accounting Policies and Notes to Accounts	1 & 2		

As per our Report of even date,
for RAMESH ATHASNIYA & COMPANY,
Chartered Accountants,

By Order of the Board,

P. Vijaya Lakshmi

Vijaya Lakshmi Panati
Managing Director.
(DIN: 06635011)

CA. RAMESH ATHASNIYA,
Partner.
M.No. 204976
Firm Regn No.0074805

Place : Hyderabad,
Date : 31st July, 2020.



Syed Khaleel Ahmed
Director.
(DIN: 05347153)

SEA GOLD INFRASTRUCTURE LIMITED

(CIN:L70200TG1993PLC016389)

Registered Office : Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

STANDALONE CASH FLOW STATEMENT FOR THE PERIOD ENDED 31ST MARCH, 2020

(Rs. In Lakhs)

Particulars	As at 31.03.2020	As at 31.03.2019
A. Cash Flow from Operating Activities:		
Net Profit before Tax and Extraordinary Items	(20.87)	(8.23)
Adjustments for:		
Depreciation	0.14	0.14
Interest expense	-Nil-	-Nil-
Interest & Other Income	-Nil-	-Nil-
Loss on Sale of Assets	-Nil-	-Nil-
Profit on Sale of Investments	-Nil-	-Nil-
Operating profit before Working Capital Changes	(20.73)	(8.09)
Adjustments for:		
Trade and Other receivables	2.12	3.32
Inventories	-Nil-	-Nil-
Trade payables and Other Current Liabilities	25.53	3.36
Provision for income Tax (D)	-Nil-	-Nil-
Cash generated from Operations	27.65	6.68
Cash flow before Exceptional Items	6.93	(1.42)
Exceptional Items and Tax	-Nil-	-Nil-
Net Cash used for Operating activities	6.93	(1.42)
B. Cash Flow from Investing Activities:		
Purchase of Fixed Assets	-Nil-	-Nil-
Sale of Fixed Assets	-Nil-	-Nil-
Capital Work in progress	-Nil-	-Nil-
Purchase of Investments	-Nil-	-Nil-
Sale of Investments	-Nil-	-Nil-
Increase / (Decrease) in Deposits	-Nil-	-Nil-
Interest & Other Income	-Nil-	-Nil-
Net Cash flow from Investing activities	-Nil-	-Nil-
C. Cash Flow from Financing Activities:		
Increase in Share Capital	0.00	-Nil-
Increase in Share Premium	-Nil-	-Nil-
Increase / Decrease in Long Term Borrowings	(6.22)	1.58
Share Issue and Preliminary Expenses	-Nil-	-Nil-
Interest Expense	-Nil-	-Nil-
Dividends Paid	-Nil-	-Nil-
Net Cash flow from Financing activities	(6.22)	1.58
Net Increase in Cash and Cash Equivalents	0.71	0.16
Cash and Cash Equivalents as at (Opening Balance)	1.25	1.09
Cash and Cash Equivalents as at (Closing Balance)	1.96	1.25

We have verified the above Cash Flow Statement of **SEA GOLD INFRASTRUCTURE LIMITED**, for the year ended on **31st March, 2020**, which has been derived from the audited annual accounts after making such adjustments / groupings as were considered appropriate and found the same to be true and correct.

As per our Report of even date,
for **RAMESH ATHASNIYA & COMPANY**,
Chartered Accountants,

CA. RAMESH ATHASNIYA,
Partner.
M.No. 204976
Firm Regn No.007480S

Place : Hyderabad,
Date : 31st July, 2020.

By Order of the Board,

P. Vijaya Lakshmi

Vijaya Lakshmi Panati
Managing Director.
(DIN: 06635011)



[Signature]
Syed Khaleel Ahmed
Director.
(DIN: 05347153)

SEA GOLD INFRASTRUCTURE LIMITED

Registered Office : Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

Statement of Changes in Equity FY 2018-19

Particulars	Equity Share Capital	Other Equity									Total equity attributable to equity holders of the company
		Reserves and Surplus				Other Comprehensive Income					
		Capital Reserve	Securities Premium Reserve	Other Reserve	Retained Earnings	Debt instrument through OCI	Equity instrument through OCI	Effective portion of Cash Flow Hedges	Revaluation Surplus	Other terms of OCI	
Balance at the beginning of the reporting period	54482400				(10726405)						43755995
Changes in accounting policy or prior period errors	-	-	-	-	(264000)	-	-	-	-	-	(264000)
Restated balance at the beginning of the reporting period	54482400				(10990405)						43491995
Total comprehensive income of the year	-	-	-	-	(824685)	-	-	-	-	-	(824685)
Dividends	-	-	-	-	-	-	-	-	-	-	0
Transfer to retained earnings	-	-	-	-	-	-	-	-	-	-	0
Any other charge	-	-	-	-	-	-	-	-	-	-	0
Balance at the end of the reporting period	54482400	0	0	0	(11815090)	0	0	0	0	0	42667310

Statement of Changes in Equity FY 2019-20

Particulars	Equity Share Capital	Other Equity									Total equity attributable to equity holders of the company
		Reserves and Surplus				Other Comprehensive Income					
		Capital Reserve	Securities Premium Reserve	Other Reserve	Retained Earnings	Debt instrument through OCI	Equity instrument through OCI	Effective portion of Cash Flow Hedges	Revaluation Surplus	Other terms of OCI	
Balance at the beginning of the reporting period	54482400				(11815090)						42667310
Changes in accounting policy or prior period errors	-	-	-	-	-	-	-	-	-	-	0
Restated balance at the beginning of the reporting period	54482400	0	0	0	(11815090)	0	0	0	0	0	42667310
Increase in Share Capital on account of Fresh issue	-										0
Total comprehensive income of the year	-	-	-	-	(2087291)	-	-	-	-	-	(2087291)
Dividends	-	-	-	-	-	-	-	-	-	-	0
Transfer to retained earnings	-	-	-	-	-	-	-	-	-	-	0
Any other charge	-	-	-	-	-	-	-	-	-	-	0
Balance at the end of the reporting period	54482400	0	0	0	(13902382)	0	0	0	0	0	40580018

SEA GOLD INFRASTRUCTURE LIMITED

Registered Office : Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

Note No : 2.1 DETAILS OF FIXED ASSETS & DEPRECIATION AS PER COMPANIES ACT, 2013

(Amount in Rupees)

[illegible]

SEA GOLD INFRASTRUCTURE LIMITED

Registered Office : Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

2 NOTES TO ACCOUNTS:

(Amount in Rupees)

2.02 Trade Receivables

Particulars	As on 31-03-2020	As on 31-03-2019
Sundry Debtors	2417341	2417341
	2417341	2417341

2.03 CASH & CASH EQUIVALENTS:

Particulars	As on 31-03-2020	As on 31-03-2019
Bank Balances in:		
(i) Current Accounts	132432	60294
(ii) Fixed Deposits with Bank more than 12 months maturity	-Nil-	-Nil-
Cash on Hand	63235	64235
	195667	124529

2.04 Loans and Advances

Particulars	As on 31-03-2020	As on 31-03-2019
Loans	15249068	15447468
Accrued Interest On Loans	1031548	1031548
	16280616	16479016

2.05 OTHER CURRENT ASSETS

Particulars	As on 31-03-2020	As on 31-03-2019
TDS Receivables	210426	210426
Deposits	173384	173384
ESD, FSD, Retention Money Etc.,	734000	734000
GST Suspense	-Nil-	13500
	1117810	1131310

SEA GOLD INFRASTRUCTURE LIMITED

Registered Office : Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

2 NOTES TO ACCOUNTS:

(Amount in Rupees)

2.06 SHARE CAPITAL:

Particulars	As on 31-03-2020	As on 31-03-2019
(A) Authorised Capital: <i>55,00,000 Equity shares of Rs.10/- each fully paid</i>	55000000	55000000
(B) Issued, Subscribed & Paid up Capital: <i>54,48,240 Equity shares of Rs.10/- each fully paid</i>	54482400	54482400
	54482400	54482400

(C) Reconciliation of Number of Shares Outstanding at the beginning and end of Reporting Period

Particulars	As on 31-03-2020		As on 31-03-2019	
	Number	Amount (Rs.)	Number	Amount (Rs.)
Shares outstanding at the beginning of the year	5448240	54482400	5448240	54482400
<u>Add:</u> Shares Issued during the year	-Nil-	-Nil-	-Nil-	-Nil-
<u>Less:</u> Shares bought back during the year	5448240	54482400	5448240	54482400
	-Nil-	-Nil-	-Nil-	-Nil-
Shares outstanding at the end of the year	5448240	54482400	5448240	54482400

(D) Names of Persons who are holding more than 5% Shares in the Paid up Capital:

Name of the Shareholder	As on 31st March 2020		As at 31st March 2019	
	No. of Shares	% of Holding	No. of Shares	% of Holding
1 PVK Engineers Private Limited	2600000	47.72	2600000	47.72
2 Radha Krishna Reddy Panati	573000	10.52	573000	10.52
3 Venkata Krishna Reddy Panati	516500	9.48	516500	9.48
	3689500	67.72	3689500	67.72

2.07 LONG TERM BORROWINGS:

Particulars	As on 31-03-2020	As on 31-03-2019
Unsecured Loans	-Nil-	621500
	-Nil-	621500

SEA GOLD INFRASTRUCTURE LIMITED

Registered Office : Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

2 NOTES TO ACCOUNTS:

(Amount in Rupees)

2.08 DEFERRED TAX LIABILITIES:

Particulars	As on 31-03-2020	As on 31-03-2019
Opening Deferred Tax Liability	18321	17019
<u>Add:</u> Timing difference during the year	445	1302
Closing Deferred Tax Liability	18766	18321

2.09 OTHER CURRENT LIABILITIES

Particulars	As on 31-03-2020	As on 31-03-2019
<u>Other Payables :</u>		
TDS Suspense (Refer Note No. 2.23)	594438	594438
Outstanding Expenses	3965562	1412209
	4560000	2006647

2.10 PROVISIONS

Particulars	As on 31-03-2020	As on 31-03-2019
Provision For Income Tax	-Nil-	-Nil-
	-Nil-	-Nil-

2.11 REVENUE FROM OPERATIONS:

Particulars	As on 31-03-2020	As on 31-03-2019
Gross Receipts	-Nil-	-Nil-
	-Nil-	-Nil-

SEA GOLD INFRASTRUCTURE LIMITED

Registered Office : Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

2 NOTES TO ACCOUNTS:

(Amount in Rupees)

2.12 OTHER INCOME:

Particulars	As on 31-03-2020	As on 31-03-2019
Interest On IT Refund	-Nil-	-Nil-
	-Nil-	-Nil-

2.13 EMPLOYEE BENEFIT EXPENSE:

Particulars	As on 31-03-2020	As on 31-03-2019
Salaries & Bonus to Staff (Refer Note No. 2.24)	384000	264000
Staff Welfare	-Nil-	2100
	384000	266100

2.14 OTHER EXPENSES:

Particulars	As on 31-03-2020	As on 31-03-2019
Bank Charges	204	979
Audit Fees	107900	75000
Consultancy Charges	125380	110000
Paper Publication Expenses	6654	33677
D Mat Maintenance	112177	26550
ROC Filing Fees	27020	-Nil-
Office Maintenance	-Nil-	1847
Other Expenses	250	-Nil-
Stock Exchange Processing Fee	381730	295000
Share Transfer Agency Charges	156599	-Nil-
Annual Listing Fees	382855	-Nil-
Application Fees	46905	-Nil-
BSE Penalty for Non Compliance	340940	-Nil-
	1688614	543053

SEA GOLD INFRASTRUCTURE LIMITED

CIN: L70200TG1993PLC016389

Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

SIGNIFICANT ACCOUNTING POLICIES & NOTES TO ACCOUNTS (1&2)

1. (A) COMPANY OVERVIEW:

The Sea Gold Infrastructure Limited (hereafter referred as "Company") was incorporated on 05-10-1993 at the Registrar of Companies, Andhra Pradesh with the objects to promote, establish, improve, develop, administer, own and run aqua cultural ponds for culturing all types of shell fish, fin fish, sea water foods and other crustacean. The Company has changed its Main Objects to Infrastructure Activities. The Company went for Capital Reduction Scheme which was approved by Honorable Andhra Pradesh High Court as on 27th August 2011.

1. (B) SIGNIFICANT ACCOUNTING POLICIES:

1.1 Basis of Preparation of Financial Statements:

- (i) Financial Statements have been prepared under the historical cost convention, in accordance with the generally accepted accounting principles and provisions of the Companies Act, 2013 as applicable to this Company. These financials have been prepared to comply in all material respects with the accounting standards notified by the Companies (Indian Accounting Standards) Rules, 2015.
- (ii) Accounting Policies not specifically referred to otherwise are consistent and in consonance with the generally accepted accounting principles followed by the Company.
- (iii) All assets and liabilities have been classified as current or noncurrent, wherever applicable, as per the operating cycle of the company as per the guidance as set out in the Schedule III to the Companies Act, 2013.

1.2 Accounting Estimates:

The preparation of the financial statements, in conformity with generally accepted accounting principles, requires the management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent liabilities as at the date of financial statements and the results of operation during the reported period. Although these estimates are based upon management's best knowledge of current events and actions, actual results could differ from these estimates which are recognised in the period in which they are determined.

1.3 Fixed Assets:

- (i) Tangible Fixed Assets:

Tangible and intangible assets (other than those acquired under Hire Purchase Schemes) are stated at cost of acquisition / revalued amount, less accumulated depreciation, if any. Cost of fixed assets includes taxes, duties, freight and other incidental expenses related to acquisition and installation after reducing Cenvat credit received/receivable, if any.

Contd...2...

SEA GOLD INFRASTRUCTURE LIMITED

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Fixed assets acquired under Hire Purchase Schemes are valued at cash price less depreciation. Borrowing costs attributable to acquisition/construction of a qualifying asset (i.e. an asset requiring substantial period of time to get ready for intended use or sale) are added to the cost of those assets, until such time as the assets are substantially ready for their intended use or sale in accordance with the requirements of Indian Accounting Standard 23 ("Ind AS 23"), "Borrowing Costs".

(ii) Intangible Fixed Assets:

Intangible assets (other than those acquired under Hire Purchase Schemes) are stated at cost of acquisition / revalued amount, less accumulated depreciation and impairments, if any. Cost of fixed assets includes taxes, duties, freight and other incidental expenses related to acquisition and installation after reducing Cenvat credit received/receivable, if any.

1.4 Depreciation:

- (i) In respect of Fixed Assets, Depreciation is provided on *Straight Line Method* at the rates and in the manner specified under Schedule II of the Companies Act, 2013. Depreciation on additions/deletions of assets during the year is provided on pro-rata basis, except low value items costing Rs 5,000/- or less which are written off fully in the year of purchase.
- (ii) In respect of Software the company has calculated the depreciation as per the provisions of Schedule II of the Companies Act, 2013 on the basis of lives of the assets instead of rates prescribed under the erstwhile Companies Act, 1956. The effect of such change is adjusted in opening balance of reserves and surplus.

1.5 Inventories:

Items of inventories other than realizable by-products are measured at lower of cost or net realizable value. Cost of inventories is arrived under FIFO method. Net realizable value is estimated selling price in the ordinary course of business, less estimated costs of completion and estimated costs necessary to make the sale. The cost of manufactured products comprises of cost of purchase, cost of conversion and other costs incurred in bringing them to their respective present location and condition including depreciation. Cost of raw materials, process chemicals, stores and spares, packing materials are determined on FIFO basis.

1.6 Investments

Investments that are readily realizable and are intended to be held for not more than one year, are classified as current investments. All other investments are classified as non-current investments. Current investments are carried at cost or fair value, whichever is lower. Non-current investments are carried at cost.

Contd...3...

1.7 Foreign Currency Transactions

Transactions in foreign currency are accounted at the exchange spot rate prevailing on the date of the transaction. Year end receivables and payables are translated at year end rate of exchange. With effect from April 1, 2011, gain/loss on account of fluctuation in exchange rates pertaining to long term foreign currency borrowings to the extent they are related to acquisition of depreciable fixed assets is adjusted to the cost of asset, and in case of other long term borrowings, the same is amortized over the life of such long term borrowings.

In all other cases , the difference on account of fluctuation in the rate of exchange is recognized in the statement of profit and loss.

1.8 Borrowing Costs:

Borrowing costs directly attributable to acquisition, construction or production of a qualifying asset are added to the cost of those assets , until such time as the assets are substantially ready for their intended use or sale, in accordance with the requirements of Indian Accounting Standard (AS) 23, "Borrowing Costs" mandated by Rule 3 of the Companies (Accounting Standards) Rules 2006. Other borrowings costs are charged to the statement of profit and loss.

1.9 Sale of Goods:

Domestic sales are recognized at the point of dispatch of goods when the substantial risks and rewards of ownership in the goods are transferred to the buyer as per the terms of the contract and are net of returns. Sales are stated net of trade discounts and sales taxes.

1.10 Revenue Recognition:**Interest Income:**

Interest and other income are accounted for on accrual basis except where the receipt of income is uncertain in which case it is accounted for on receipt basis.

1.11 Purchases:

Purchases represent invoice value of goods purchased net of discounts and include freight inward.

1.12 Taxes on Income:

Current Tax is determined based on the amount of tax payable in respect of taxable income for the period.

Deferred Tax assets and liabilities are recognized for the future tax consequences attributable to timing differences between the financial statements carrying amount of existing assets and liabilities and their respective tax basis. Deferred tax assets and liabilities are measured using enacted tax rates or tax rates that are substantively enacted at the Balance Sheet dates. The effect on deferred tax assets and liabilities of a change in tax rates is recognized in the period that includes the enactment date.

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1.13 Cash Flow Statement:

The Cash Flow Statement is prepared by the "Indirect Method" set out in Indian Accounting Standard (Ind AS) -7 on "Cash Flow Statements" and presents the cash flows by operating, investing and financing activities of the company. Cash and Cash equivalents presented in the Cash Flow Statement consist of cash on hand, with Banks in Current accounts and Fixed Deposits.

1.14 Earnings Per Share:

Basic Earnings Per Share is calculated by dividing the net profit or loss for the period attributable to equity shareholders by the weighted average number of equity shares outstanding during the period. The weighted average number of equity shares outstanding during the period and for all periods presented is adjusted for events, such as bonus shares, other than the conversion of potential equity shares, that have changed the number of equity shares outstanding, without a corresponding change in resources.

For the purpose of calculating diluted earnings per share, the net profit or loss for the period attributable to equity shareholders and weighted average number of equity shares outstanding during the period is adjusted for the effects of all dilutive potential equity shares.

SEA GOLD INFRASTRUCTURE LIMITED

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NOTES ON ACCOUNTS:

2.15 Previous year Balance Sheet figures have been regrouped/ rearranged wherever necessary.

2.16 Contingent liabilities not provided for: -Nil-

2.17 Auditors Remuneration:

(Amount in Rupees)

Sl. No.	Particulars	As on 31-03-2020	As on 31-03-2019
1.	Audit Fees	80,000	75,000
2.	Taxation and Other Matters	-Nil-	-Nil-
3.	Reimbursement of Goods & Service Tax	14,400	13,500
Total:-		94,400	89,500

2.18 Balances under Sundry Debtors, Sundry Creditors, other receivables and payables are subject to confirmation to be receivable from the parties.

2.19 The Company does not possess information as to which of its suppliers are Ancillary Industrial Undertaking/Small Scale Industrial Undertakings holding permanent registration Certificate issued by the Directorate of Industries of a State or Union Territory. Consequently, the liability, if any, of interest which would be payable under 'The Micro, Small and Medium Enterprises Development Act, 2006', cannot be ascertained. However, the Company has not received claims in respect of interest.

2.20 In the opinion of the Board of Directors, the current assets, and loans and advances have the value on realization at least equal to the amount at which they are stated at the Balance Sheet and provision for all known and determined liabilities is adequate and not in excess of amount reasonably required.

2.21 As per Indian Accounting Standard -24 "Related Party Disclosures" issued by the Institute of Chartered Accountants of India, the company's related parties with whom the company has entered into transactions during the year in the ordinary course of business, as certified by the Management are disclosed below:

(I) Names of Related Parties and Nature of Relationship:

Sl. No.	Name of the Related Party	Nature of Relationship
1.	Vijaya Lakshmi Panati	Managing Director
2.	PVK Engineers Private Limited	Associate Company
3.	Venkat Satish Verapaneni	Director
4.	Rajasekhar Reddy Mathuru	Director
5.	Syed Kaleel Ahmed	Director
6.	P Vijayalakshmi	Director
7.	Sattaiah Bathula	Director

Contd...2...

SEA GOLD INFRASTRUCTURE LIMITED

CIN: L70200TG1993PLC016389

Plot No.270E/A, Mch No.985 Road No.10, Jubilee Hills, Hyderabad, Telangana 500033

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(II) Transactions with Related Parties:

Sl. No.	Name of the Person	Amount (Rs.) 2019-2020	Amount (Rs.) 2018-2019
	-Nil-	-Nil-	-Nil-
	Total	-Nil-	-Nil-

The Management of the Company feels that the above payments under various heads to Directors, their relatives and associated enterprises are reasonable compared to the Market conditions.

- 2.23 Other Current Liabilities shown under **Note No.2.09** includes an amount of Rs.5,94,438/- as TDS Suspense which was claimed as TDS Receivable in FY 2014-2015, later on it got reversed in Form 26 AS of said financial year. However, in the FY 2015-2016 the company has received Income Tax refund to the extent of such amount for which the company is not eligible to take credit.
- 2.24 Salaries provided during the year Rs.528000/- relating to FY 2018-19 and FY 2017-18 were adjusted in Corresponding comparative under Note No.2.13 and Statement of changes in other equity Respectively.
- 2.25 Balances of Debtors and Creditors are subject to confirmation.
- 2.26 All the figures have been rounded off to nearest rupee.
- 2.27 All the previous year figures are regrouped or reclassified where ever necessary to confirm to current year presentation.

As per Our Report of even date,
For RAMESH ATHASNIYA & COMPANY,
Chartered Accountant

By Order of the Board,

P. Vijaya Lakshmi

[Signature]

CA. RAMESH ATHASNIYA,
Partner.
M. No. 204976
Firm Regn. No. 007480S

VIJAYA LAKSHMI PANATI
Director.
(DIN: 06635011)

SYED KHALEEL AHMED
Director.
(DIN: 05347153)

PLACE : Hyderabad,
DATE : 31st July, 2020.



SEA GOLD INFRASTRUCTURE LIMITED

Registered Office: Plot No. 270/E/A, Road No.10, MCH No.985, Jubilee Hills,
Hyderabad – 500 033, Telangana, INDIA

Email: seagoldacqa@gmail.com, Website: www.seagoldaqua.com

CIN: L70200TG1993PLC016389

Form No. MGT-11

Proxy form

[Pursuant to section 105(6) of the Companies Act, 2013 read with Rule 19(3) of the
Companies (Management and Administration) Rules, 2014]

CIN No : L70200TG1993PLC016389
Registered Folio No./Client ID :
Name of the company : **SEA GOLD INFRASTRUCTURE LIMITED**
Registered Office Address : Plot No.270/E/A, Road No.10, Jubilee Hills,
Hyderabad – 500 033, Telangana, India

Name of the Member(s)		
Registered Address		
E-mail Id	Folio No /Client ID	DP ID

I/We, being the member(s) of _____ shares of the abovenamed company. Hereby
appoint

Name :	E-mail Id:
Address:	
Signature , or failing him	

Name :	E-mail Id:
Address:	
Signature , or failing him	

Name :	E-mail Id:
Address:	
Signature , or failing him	

DP ID:

I/We, being the member(s) _____
of _____ shares of the above named company, hereby appoint

1. Name : _____
Address : _____
E-mail id: _____
Signature: _____ or falling him

2. Name : _____
Address : _____
E-mail id: _____
Signature: _____ or falling him

3. Name : _____
Address : _____
E-mail id: _____
Signature: _____ or falling him

as my/ our proxy to attend and vote (on a poll) for me/us and on my/our behalf at the 26th Annual General Meeting of the company, to be held on the Thursday, 31st December'20 at 04.00 P.M. at the Registered office of the company situated at Plot No. 270/E/A, M.C.H.No.985, Road No.10, Jubilee Hills, Hyderabad-500033 and at any adjournment thereof in respect of such resolutions as are indicated below:

Resolution No.:

Sl. No.	Resolution(S)	Vote	
		For	Against
1.	To receive, consider and adopt: - the Audited Financial Statements of the Company for the financial year ended March 31, 2020, the Report of the Board of Directors and the Report of the Auditors thereon;		
2.	To appoint a Director in place of Mr. Syed Khaleel Ahmed, Director (holding DIN 05347153), who retires by rotation and, being eligible, offers himself for re-appointment.		

* Applicable for investors holding shares in Electronic form.

Signed this day of 2020

Affix 15
paise
Revenue
Stamps

Signature of the shareholder across Revenue Stamp

Signature of Shareholder _____

Signature of Proxy holder _____

Note:

1. This form of proxy in order to be effective should be duly completed and deposited at the Registered Office of the Company not less than 48 hours before the commencement of the Meeting.
2. The proxy need not be a member of the company.

SEA GOLD INFRASTRUCTURE LIMITED

Registered Office: Plot No.270/E/A, Road No.10, Jubilee Hills, Hyderabad – 500 033, Telangana

Email: seagoldacqa@gmail.com, Website: www.seagoldacqua.com

CIN: L70200TG1993PLC016389

ATTENDANCE SLIP

(Please fill this attendance slip and hand it over at the entrance of the meeting hall)

26th Annual General Meeting on 31st December, 2020

DP ID*		Folio No
Client ID*		No. of Shares held

Full Name of the Members attending
(In block capitals) |

Name of Proxy (To be filled in, if the
proxy attends instead of the member) |

I, certify that I am member /Proxy for the member of the company, I hereby record my presence at the 26th Annual General Meeting of Sea Gold Infrastructure Limited held at the Registered office of the Company situated at Plot No. 270/E/A, M.C.H.No.985, Road No.10, Jubilee Hills, Hyderabad-500033 on Thursday, the 31st December, 2020 at 04.00 P.M.

(Signature of Member's / Proxy attending the Meeting)

Note:

1. Members are requested to bring their copies of the Annual Report to the meeting, since further copies will not be available.
2. The Proxy, to be effective should be deposited at the Registered Office of the Company not less than FORTY-EIGHT HOURS before the commencement of the meeting.
3. A Proxy need not be a member of the Company.
4. In the case of joint holders, the vote of the senior who tenders a vote, whether in person or by Proxy, shall be accepted to the exclusion of the vote of the other joint holders. Seniority shall be determined by the order in which the names stand in the Register of Members.
5. The submission by a member of this form of proxy will not preclude such member from attending in person and voting at the meeting.
6. **No Gifts, Gift Coupons, Cash in lieu of Gifts will be given at the AGM.**

* Applicable for Investors holding shares in electronic form.

