



202, SAMPADA, B/H. TULSI COMPLEX, MITHAKHALI'S SIX ROADS,
NAVRANGPURA, AHMEDABAD-380 009. (GUJARAT)

PH. : 079-26447302, 26447598

Email : mangalamseeds@gmail.com, Web Site : www.mangalamseeds.com

CNI :- L01112GJ2011PLC067128

Ref No. :

Date :

30th May, 2025

Stock Code: BSE – 539275

ISIN: INE829S01016

To,
The Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street Fort,
Mumbai-400 001

Dear Sir / Madam,

**ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE PERIOD ENDED
31.03.2025 AS PER REGULATION 24A OF SEBI (LISTING OBLIGATION AND
DISCLOSURE REQUIREMENTS) REGULATIONS, 2015:**

Sir / Madam,

With reference to SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 08th February 2019 and in compliance to Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, we are enclosing herewith the Annual Secretarial Compliance Report pertaining to the financial year ended 31st March, 2025 issued by Mr. Nayan P. Pitroda, Proprietor of M/s Pitroda Nayan & Co, Company Secretary in whole time practice.

Kindly take the same on your records and acknowledge the receipt.

Thanking you,

Yours faithfully,

For Mangalam Seeds Limited



Samiksha Bindrani
Company Secretary & Compliance Officer
Membership No-A75574

Secretarial Compliance Report of Mangalam Seeds Limited
(CIN: L01112GJ2011PLC067128) for the year ended March 31, 2025

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Mangalam Seeds Limited (hereinafter referred as 'the listed entity'), having its Registered Office at **202, Sampada Complex, B/H Tulsi Complex, Mithakhali Six Road, Navrangpura, Ahmedabad 380009**. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on **March 31, 2025**, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, Pitroda Nayan & Co. have examined:

- (a) all the documents and records made available to us and explanation provided the listed entity,
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which have been relied upon to make this certification, for the year ended **31.03.2025** ("Review Period") in respect of compliance with the provisions of:
 - i. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, Circulars, Guidelines issued thereunder; and
 - ii. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, Circulars, Guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the Circulars/ Guidelines issued thereunder, have been examined, include: -

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **NOT APPLICABLE**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **NOT APPLICABLE**



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- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **NOT APPLICABLE**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **NOT APPLICABLE**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **NOT APPLICABLE**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) (Other regulations as applicable) and circulars/ guidelines issued thereunder;

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

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

S r N o.	Compliance Requirement (Regulations/ circulars/ guide- lines including specific clause)	Regu- lation/ Circula r No	Deviation s	Actio n Take n by	Type of Action	Details of Violatio ns	Fine Amo unt	Observati ons / Re- marks of the Practicing Company Secretary	Manag ement Respon se	Rem arks
					Ad visory /Cl arif ication / Fin e/ Sho w Cause Not ice / Wa rning etc					
1.	Clause 4 of Schedule B read with Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015:	Clause 4 of Sched ule B read with Regula tion 9	The Company has delayed in the intimatio n to the stock	-	-	Non- complia nce with provisio ns of the SEBI (Prohibi tion of	-	It was observed that there was a delay in the intimation to the	The delay occurre d due to the non- viabi	N.A.

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	Clause 4 (2) of Schedule B read with Regulation 9 of PIT Regulations, which inter-alia states that "trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results	of SEBI (Prohibition of Insider Trading) Regulations, 2015.	exchange regarding the closure of the trading window for the quarter ending on June, 2024 and September, 2024, pursuant to the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015.			Insider Trading) Regulations, 2015.		stock exchange regarding the closure of the trading window for the quarter ending on June, 2024 and September, 2024, pursuant to the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015.	appointing a dedicated Compliance Officer during the said period, which led to an administrative gap in the timely dissemination of the trading window closure intimations.	
2.	Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015: The board of directors or head(s) of the organisation of every person required to handle unpublished price sensitive information shall ensure that a structured digital database is maintained containing the nature of unpublished	Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015	Delay by Company in entering UPSI Sharing Entries in software (Structured Digital Database)	-	-	Non-compliance of Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015	-	Delay by Company in entering UPSI Sharing Entries in software (Structured Digital Database)	Delay occurred due to the non-availability of appointing a dedicated Compliance Officer during the relevant period. This led to a temporary	NA



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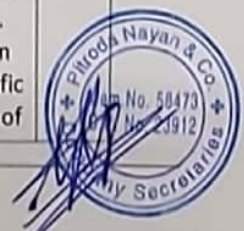
<p>price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.</p>							<p>timely maintenance of records, although all mandatory disclosures have now been duly updated in the system.</p>	
<p>3. Clause 4 of Schedule B read with Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with SEBI Circular SEBI/HO/ISD/ISD-SEC-4/P/CIR/2022/107 dated 05th</p>	<p>Clause 4 of Schedule B read with Regulation 9 of SEBI (Prohibition of</p>	<p>The listed entity has not complied with the provisions for accessing the platform designated by the Designate</p>	<p>-</p>	<p>-</p>	<p>Non compliance of Clause 4 of Schedule B read with Regulation 9 of SEBI (Prohibi</p>	<p>-</p> <p>The listed entity has not complied with the provisions for accessing the platform designated by the Designate</p>	<p>Due to inadvertence, the company failed to restrict trading by Designated Persons</p>	<p>NA</p>



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<p>August, 2022 and SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/124 dated 19th July, 2023:</p> <p>The Designated Depository ("DD") appointed by the listed company shall enable access to the respective listed company on the portal/ platform a framework for developing a system to restrict the trading by Designated Persons (DPs) by way of freezing the PAN at security level during Trading Window closure period.</p>	<p>Insider Trading) Regulations, 2015 read with SEBI Circular SEBI/HO/ISD/ISD-SEC-4/P/CIR/2022/107 dated 05th August, 2022 and SEBI/HO/ISD-PoD-2/P/CIR/2023/124 dated 19th July, 2023</p>	<p>d Depository and freezing the PAN of the Designated Persons during Trading Window closure period.</p>			<p>tion of Insider Trading) Regulations, 2015 read with SEBI Circular SEBI/HO/ISD/ISD-SEC-4/P/CIR/2022/107 dated 05th August, 2022 and SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/124 dated 19th July, 2023</p>	<p>Depository and freezing the PAN of the Designated Persons during Trading Window closure period.</p>	<p>(DPs) by freezing the PAN at the security level during the Trading Window closure period; however, no trading in securities was conducted during that period.</p>	
<p>4. Regulation 30 of SEBI (LODR) Regulations, 2015:</p> <p>Disclosure to be filed for appointment of auditor as per the format prescribed as soon as possible but not later than Twenty - four hours of receipt of consent from</p>	<p>Regulation 30 of SEBI (LODR) Regulations, 2015</p>	<p>The Disclosure is not made as per the format prescribed under the circular.</p>	-	-	<p>Non - compliance of Regulation 30 of SEBI (LODR) Regulations, 2015</p>	<p>The company has filed the Disclosure but the same is not as per the format prescribed under the Circular as on 29/06/2024. However,</p>	<p>Deviation occurred inadvertently and without any intent of non-compliance. Upon identification of</p>	NA



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	the auditor.							the company has uploaded a revised disclosure on 19/07/2024.	the issue, the Company took immediate corrective action and uploaded a revised disclosure in the prescribed format	
5.	<p>Regulation 30 of SEBI (LODR) Regulations, 2015:</p> <p>Disclosure for resignation of company Secretary / compliance officer should be submitted along with the copy of resignation letter</p>	Regulation 30 of SEBI (LODR) Regulations, 2015	The Disclosure for resignation of company Secretary / compliance officer was submitted without the copy of resignation letter	-	-	Non-Compliance of Regulation 30 of SEBI (LODR) Regulations, 2015	-	The Disclosure for resignation of company Secretary / compliance officer was submitted without the copy of resignation letter as on 09/07/2024. However, the company has uploaded a revised disclosure on 23/09/2024 along with	Deviation occurred inadvertently and without any intent of non-compliance. Upon identification of the issue, the Company took immediate corrective action and uploaded a revised	NA



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								resignation letter.	disclosure in the prescribed format	
6.	<p>Regulation 6 (1A) of SEBI (LODR) Regulations, 2015:</p> <p>Any vacancy in the office of the Compliance Officer shall be filled by the listed entity at the earliest and in any case not later than three months from the date of such vacancy</p>	Regulation 6 (1A) of SEBI (LODR) Regulations, 2015	The company has not appointed company Secretary / compliance officer within a period of three months from the date of such vacancy	Bombay Stock Exchange (BSE)	Finance	Non-compliance of Regulation 6 (1A) of SEBI (LODR) Regulations, 2015	Rs. 99,120/- including GST	The company has not appointed company Secretary / compliance officer within a period of three months from the date of such vacancy. The company Secretary / compliance officer was appointed on 07 th January, 2025.	The company was unable to find a suitable candidate with the required experience and expertise for the position of Company Secretary and Compliance Officer within the due time. However, The company Secretary / compliance officer was appointed on 07 th January, 2025	NA

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7.	SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31 st December, 2024 and BSE notice 20250102-4: The Integrated Filing in PDF as per the prescribed format shall be submitted within 24 hrs from the Outcome of the Board meeting ('OBM')	SEBI/HO/CFD-PoD-2/CIR/P/2024/185 dated 31 st December, 2024 and BSE notice 20250102-4	The Company has filed the Integrated Filing (Financial) in pdf format on 17 th February, 2025. However, the Outcome of the Board meeting was filed on 11 th February, 2025. The filing was delayed by 5 days.	-	-	Non-compliance of SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31 st December, 2024 and BSE notice 20250102-4	-	The Company has filed the Integrated Filing (Financial) in pdf format on 17 th February, 2025. However, the Outcome of the Board meeting was filed on 11 th February, 2025. The filing was delayed by 5 days.	Due to inadvertence	NA
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended March 31, 2024	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / Deviations and actions taken /penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
NOT APPLICABLE						



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

Sr No.	Particulars	Compliance Status (Yes / No/ NA)	Observations / Remarks by PCS
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).</p>	Yes	-
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	Yes Yes	-
3.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> The Listed entity is maintaining a functional website Timely dissemination of the documents/ information under a separate section on the website Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/section of the website 	Yes Yes Yes	-
4.	<p>Disqualification of Director:</p> <p>None of the Directors of the Company is disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	No Directors of the Company disqualified u/s 164 of the Companies Act, 2013



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5	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	<p>NA</p> <p>NA</p>	
6	<p>Preservation of Documents:</p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	<p>Yes</p>	
7	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees during the financial year as prescribed in SEBI Regulations.</p>	<p>Yes</p>	
8	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	<p>Yes</p> <p>NA</p>	<p>Prior Approval for all the Related Party Transactions was obtained from Audit Committee.</p>
9	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	<p>No</p>	<p>Disclosure pertaining to appointment of statutory auditor on 29/06/2024 and resignation of Company secretary on 09/07/2024 was not as per the format prescribed. However, the company uploaded the revised disclosure for the</p>

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			same on 19/07/2024 and 23/09/2024 respectively.
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	There has been Delay by Company in entering UPSI Sharing Entries in software (Structured Digital Database)
11	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and Circulars/ Guidelines issued thereunder.	NA	No action(s) has been taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges except as stated in Point 1 (a)
12	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of Chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	Yes	
13	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	No additional non-compliance was observed

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.

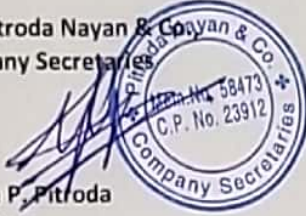


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4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For. Pitroda Nayan & Co.
Company Secretaries



Nayan P. Pitroda
Proprietor

Mem.No.: 58473 C.P.No.: 23912
Peer Review Certificate No. 5509/2024
UDIN.: A058473G000510342

Date: 30/05/2025
Place: Ahmedabad

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