

MGEL/CS/NSE/2022-23/13

Date: May 30, 2022

To,
Listing Compliance Department
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block-G,
Bandra Kurla Complex, Bandra,
Mumbai-400 051, Maharashtra.

Company Symbol: MGEL (EQ), ISIN: INE0APB01016

Sub: Secretarial Compliance Report for the year ended March 31, 2022 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/Madam,

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the secretarial compliance report issued by SCS and Co. LLP, Practising Company Secretaries for the year ended March 31, 2022.

Kindly take this information on your record.

Thanking You.

Yours faithfully,
For Mangalam Global Enterprise Limited

Vrunda Patel
Company Secretary & Compliance Officer

Enclosed: A/a.



સ્વસ્તિ
શ્રી ગુરુભ્યો નમઃ

Mangalam Global Enterprise Limited

CIN: L24224GJ2010PLC062434

Regd. Office: 101, Mangalam Corporate House, 42, Shrimali Society, Netaji Marg, Mithakhali, Navrangpura,
Ahmedabad-380009, Gujarat (INDIA) Tel: +91 79 61615000 (10 Lines) E mail: info@groupmangalam.com

To,
The Board of Directors,
Mangalam Global Enterprise Limited
CIN:- L24224GJ2010PLC062434
101, Mangalam Corporate House,
42, Shrimali Society, Netaji Marg,
Mithakhali, Navrangpura, Ahmedabad, 380009.

Sir/Madam,

SECRETARIAL COMPLIANCE REPORT

We have been engaged by **Mangalam Global Enterprise Limited** (hereinafter referred to as 'the Company' bearing CIN:- **L24224GJ2010PLC062434** whose Equity Shares are Listed on National Stock Exchange of India Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No CIR/CFD/CMD/1/27/2019 dated 8th February, 2019 and to issue the Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and Circulars/guidelines issued thereunder from time to time and issue a report thereon.

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

Secretarial Compliance Report is enclosed herewith.

For SCS and Co LLP
Company Secretaries
Firm Registration Number: - L2020GJ008700
Peer Review Number: - 1677/2022

Anjali Sangtani
Partner
M No. A41942, COP: - 23630
UDIN:- A041942D060428119
Date: - May 30, 2022
Place: -Ahmedabad

**SECRETARIAL COMPLIANCE REPORT OF
MANGALAM GLOBAL ENTERPRISE LIMITED
For the Financial Year ended on March 31, 2022**

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We, have examined:

- all the documents and records made available to us and explanation provided by Mangalam Global Enterprise Limited ("the Company" or "the listed entity" or "MGEL"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity and
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended on March 31, 2022 ("Review Period") in respect of compliance with the provisions of

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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;

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (to the extent applicable);
- and circulars/ guidelines/Amendments issued thereunder,

And based on the above examination and explanation/clarification given by the Company and its officers/KMP's,

We hereby report that, during the review period;

- The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder to the extent applicable and in the manner prescribed;
- The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records;
- No action has been taken against the listed entity/ its promoters/ directors/~~material subsidiaries~~ either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder;
- The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Schedule B of the SEBI (Prohibition of Insider Trading) Regulations, 2015. Intimation of Closure of Trading Window	Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company delayed in closing of Trading window for the purpose of Recommending Issue of Bonus	Trading window remained open by 1 day, however No Trade executed by Insiders of Company during span of delay in intimation of Trading Window Closure. During the reporting period, Company has adhered to timelines for all the intimations, disclosures and	Company is advised to take due care for making all compliances w.r.t applicable laws and their amendments within due dates in future.

		Shares. (Intimation of Board meeting for Recommendation of Bonus Shares was given by company on July 13, 2020). Company closed and intimated to National Stock Exchange of India Limited ("NSE") about the trading Window Closure from July 14, 2020 at 7:45:09 P.M.	compliances required to be made by Company under applicable act, rules and regulations thereto.	
2.	Regulation 4(1) of SEBI (Prohibition of Insider Trading Regulations), 2015	Shares acquired by Insiders during closure of Trading Window. Ms. Sonal Madhusudan Garg (PAN AKQPG3585Q), being an immediate relative (daughter) of Mr. Madhusudan Garg (Independent Director of MGEL), being designated person as per SEBI provisions who acquired 58 Equity Shares amounting to Rs. 2662.20/- of MGEL on January 5, 2021 and 606 Equity Shares amounting to Rs. 27,807.10/- on January 6, 2021 during the closure of Trading Window w.r.t. approval/adoption of Unaudited Financial Results for the quarter and nine months ended 31 st December, 2020.	On analyzing weekly Benpos position by Compliance Officer, Compliance officer came to know that there is an change in holding of Ms. Sonal Garg during closure of Trading Window, Compliance officer immediately informed Ms. Sonal Garg via email that there is change in shareholding position of her during the closure of trading window and for which already intimation via email w.r.t. closure of trading window was intimated. Compliance officer also informed via mail to her the consequence of trading by designated person or immediate relative of designated person during such closure of trading window.	Insiders of the Company are advised to adhere to SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time and Company's Code of Internal Procedures and Conduct for Prevention of Insider Trading.

We further report that, during the review period, following regulations issued by the Securities and Exchange Board of India were not applicable to the Company, since there were no such instances occurred during the review period that requires the compliance under the said regulations;

- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Upto August 12th 2021) and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (with effect from August 13, 2021) ;

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- c. Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; (Upto June 09, 2021) and Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 ((with effect from June 10, 2021)
- d. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Upto August 08, 2021);
- e. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (Upto August 08, 2021);
- f. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (with effect from August 09, 2021);
- g. The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries"
- h. circulars/ guidelines/Amendments issued thereunder.

For SCS and Co LLP

Company Secretaries

Firm Registration Number: - L2020GJ008700

Peer Review Number: - 1677/2022

Anjali Sangtani
Partner

M No. A41942, COP: - 23630

UDIN:- A041942D000428119

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