

Date: June 30, 2021

To
BSE Limited
Compliance Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort
Mumbai - 400001.

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the Year ended March 31, 2021

Ref: Security Code: 514418

Pursuant to Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, we hereby submit the Annual Secretarial Compliance Report for the Year ended March 31, 2021 duly signed by Mr. Yogesh Sharma, Practicing Company Secretary and Secretarial Auditor of the Company.

We request you to take the aforesaid report on record.

Thanking you,

Yours faithfully,
For Mangalam Organics Limited


Heena Tank
Company Secretary



YOGESH SHARMA & Co.

COMPANY SECRETARIES

Yogesh M. Sharma
M.Com, M. Phil, M.M.M, M.F.M, LLB, ACS.
Mob No. 9833124864

Office: 9082951462
Email ID: csymsharma@gmail.com

Secretarial Compliance Report of Mangalam Organics Limited

For the Financial Year Ended 31st March, 2021

To,
Board of Directors,
Mangalam Organics Limited,
Kumbhivali Village,
Savroli Kharpada Road,
Taluka Khalapur, Khopoli 410203

We have examined:

- (a) all the documents and records made available to us through scanned copies by email and explanation provided by **Mangalam Organics Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2021 ("Review Period") in respect of compliance with the provisions of:

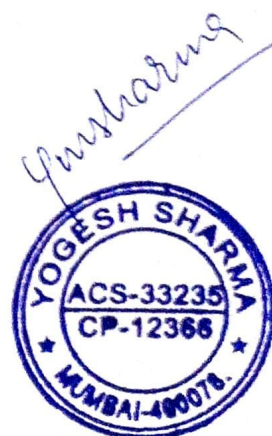
- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, includes:-



- (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 to listed entity during review period)**;
- (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 to listed entity during review period)**;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not Applicable to listed entity during review period)**;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not Applicable to listed entity during review period)**;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not Applicable to listed entity during review period)**;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) 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;

and circulars/ guidelines issued thereunder; and based on the above examination, we hereby report that, during the Review Period:



(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder except:

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1)	Regulation 18(2)(b) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Audit Committee meeting dated 27 th October, 2020 was held in presence of One Independent Director and Executive Director.	Out of Two, One Independent Director was present at the Audit Committee Meeting held on 27 th October, 2020 along with Executive Director, as the other Independent Director was not present due to ill health as informed by the Management and the same was reported in Corporate Governance Report, December, 2020.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.

(c) There were no actions taken against the listed entity/ its promoters/ directors/ ~~material subsidiaries~~ either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:



Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1)	Regulation 18(1)(d) of LODR Chairperson of Audit Committee was not present at Annual General Meeting held for the year ended 31 st March, 2019 due to ill health and the same was reported in Corporate Governance Report in September, 2019.	31/03/2020	The Chairperson of Audit Committee has attended the Annual General Meeting held for the year ended 31 st March, 2020.	Action taken by Listed entity is Satisfactory.

Place: MUMBAI
 Date: 28th June, 2021
 UDIN: A033235C000530591



For YOGESH SHARMA & Co.

Yogesh Sharma
 Prop. YOGESH SHARMA
 ACS No. - 33235
 C.P No. - 12366

Note:

Due to restricted movement amid COVID-19 pandemic, we conducted the secretarial audit by examining the Secretarial Records including Minutes, Documents, Registers and other records etc., and some of them received by way of electronic mode from the Listed entity and could not be verified from the original records. The management has confirmed that the records submitted to us are the true and correct.