

Magnanimous Trade & Finance Limited

Regd. Office: 21C- Barwara House Colony, Civil Line Ajmer Puliya, Ajmer Road,
Jaipur, Jaipur-302006, Rajasthan, India

Contact No.: +91 9819685747 **Email:** magnanimoustrade@gmail.com

CIN No. L65923RJ1991PLC059251

Website: mtml.in

Date: - 14-05-2026

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

SCRIP CODE: 512377

Subject: - Submission of Annual Secretarial Compliance Report vide SEBI Circular No CIR/CFD/CMD1/27/2019 dated February 08, 2019, and Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015 for the year ended 31st March 2026.

Dear Sir / Madam,

In pursuant to SEBI Circular No CIR/CFD/CMD 1/27/2019 dated February 08, 2019, and Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015, we are attaching herewith the Annual Secretarial Compliance Report of Magnanimous Trade and Finance Limited issued by Ms. Krina Gokul Kumar Shah, Practicing Company Secretary (having membership no. A66521 & Certificate of Practice No. 27764) dated 14th May 2026 for the financial year ended 31st March, 2026.

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

By the order of the Board of Directors.

For, Magnanimous Trade and Finance Limited

Kurjibhai Rupareliya
Managing Director
DIN: 05109049

CS KRINA SHAH

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SECRETARIAL COMPLIANCE REPORT MAGNANIMOUS TRADE AND FINANCE LIMITED FOR THE YEAR ENDED ON 31ST MARCH 2026

[Pursuant to SEBI circular CIR/CFD/CMD1/27/2019 dated February,08, 2019]

I, Krina Gokul Kumar Shah, Practicing Company Secretary have examined;

- (a) All the documents and records made available to us and explanation provided by the Magnanimous Trade and Finance 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 2026 ("Review Period") in respect of compliance with the provisions of:
 - (i) **The Companies Act, 2013 (the Act)** and rules made thereunder;
 - (ii) The Depository Act 1996 and the Regulations and Byelaws framed thereunder;
 - (iii) **Foreign Exchange Management Act, 1999** and the rules and regulations made thereunder to extend of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;
 - (iv) The **Securities and Exchange Board of India Act, 1992** ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
 - (v) The Securities Contracts (Regulations) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, Circulars, guidelines issued thereunder Securities 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; **During the review period the Company has issued and allotted Bonus Equity Shares as per SEBI ICDR**
- (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 the listed entity during the Review Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014
(Not Applicable to the listed entity during the Review Period)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not Applicable to the listed entity during the Review Period)**

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- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not Applicable to the listed entity during the Review Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and
- (i) Securities and Exchange Board of India (Registrar to an issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client.
- (j) The Securities and Exchange Board of India (Delisting of Equity Shares Regulations, 2009; and circulars/guidelines issued there and based on the above examination; **(Not Applicable to the listed entity during the Review Period)**

We hereby report that, during the Review Period, the Compliance status of the Listed entity is appended as below:

S.N.	Particulars	Compliance status (Yes/No/NA)	Observations/ Remarks by PCS
1.	<u>Secretarial Standard:</u> 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).	Yes	-
2.	<u>Adoption and timely updation of the Policies:</u> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity. • All the policies are in conformity with SEBI Regulations and have been reviewed & timely updated as per the regulations/circulars /guidelines issued by SEBI.	Yes	-
3.	<u>Maintenance and disclosures on Website:</u> • The listed entity maintains a functional website.	Yes	-

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	- 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) of Listing Regulations are accurate and specific which redirects to the relevant document(s)/ section of the website.		
4.	<u>Disqualification of Director:</u> None of the Directors of the listed entity are disqualified under Section 164 of the Companies Act, 2013, as confirmed by the listed entity.	Yes	-
5	<u>Details related to Subsidiaries of listed entity have been examined w.r.t.:</u> (a) Identification of material subsidiary companies; (b) Requirements with respect to disclosure of material as well as other subsidiaries.	NA	The listed entity does not have any material subsidiary company.
6	<u>Preservation of Documents:</u> 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 Listing Regulations.	Yes	-
7	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start	Yes	-

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	of every financial year as prescribed in Listing Regulations.		
8	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.	Yes	-
9	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of Listing Regulations within the time limits prescribed thereunder.	Yes	-
10	<u>Prohibition of Insider Trading:</u> The listed entity is following Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11	<u>Actions taken by SEBI or Stock Exchanges (s) if any;</u> No Actions 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.	Yes	-

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12	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> 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 Listing Regulations.	Yes	
13	<u>Additional non-compliances observed, if any:</u> No additional non-compliance observed for any of the SEBI regulation/circular/guidance note etc. except as reported above.	Yes	-

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

Sr. No.	Compliance Requirements (Regulations/ circulars/ guidelines including Specific Clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
None			

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

The following are the details of 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;

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letters,	Observations/ remarks of the Practicing Company Secretary, if any

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			debarment etc.	
None				

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

Sr. No.	Compliance Requirements (Regulations / circulars/ guidelines including Specific Clause)	Deviations and Action taken by,	Observations made by Practicing Company Secretaries in the Secretarial Compliance report for the previous 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.	Regulation 33 of SEBI (LODR) Regulations, 2015. Submission of unaudited financial results (Standalone & Consolidated) within 45 days of the end of the quarter.	Submitted Consolidated financial results 21 days later. BSE imposed a fine of 123900 (Rupees One Lakhs Twenty-Three Thousand Nin Hundred Only) including GST @ 18%	The Company submitted Consolidated Financial Results 21 days later for the quarter ended 30 th June 2024	The default was not intentional, it was due to non-avoidable reasons, and the company has deposited the fine amount in full to the BSE.	-
2.	Regulation 17(1), 19(1)/19(2) & 20(2)/(2A) of the SEBI (LODR) Regulations, 2015	Composition of the Board & Committee not as per the provisions of the SEBI (LODR) Regulations, 2015	Composition of the Board & Committee not as per the provisions of the Regulation 17(1), 19(1)/19(2) & 20(2)/(2A) of the SEBI (LODR)	Composition of the Board & Committee not as per the provisions of the Regulation 17(1), 19(1)/19(2) & 20(2)/(2A)	-

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			BSE imposed a fine of Rs 829540 (Rupees Eight Lakhs Twenty-Nine Thousand Five Hundred Forty Only) including GST @ 18% on the Company for non-compliance under the regulations 17(1), 19(1)/19(2) & 20(2)/(2A) of the SEBI (LODR) Regulations, 2015 till the quarter ended September 2024.	Regulations, 2015. But the above regulations are not applicable to the Company for the period for which fine is imposed.	of the SEBI (LODR) Regulations , 2015. But the above regulations are not applicable to the Company for the period for which fine is imposed in terms of Regulation 15 of SEBI (LODR) Regulations , 2015. The Company has made an application to the BSE to wave off the said fine.	
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Assumption & Limitation of scope and Review:

1. Compliance with 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.
4. This Report is solely for the intended purpose of Compliance in term of Regulation 24A (2) of the assurance as to the future viability of the listed entity nor of the efficacy

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or effectiveness with which the management has conducted the affairs of the listed entity.

For, Krina Gokulkumar Shah

KRINA
GOKUL
SHAH

Digitally signed by
KRINA GOKUL SHAH
Date: 2026.05.14
17:19:24 +05'30'

Krina Gokulkumar Shah

Practicing Company Secretary

Membership No.: A66521

C.P. No.: 27764

UDIN No.: A066521H000363422

Date: 14.05.2026

Place: Ahmedabad