



MANGALAM SEEDS LIMITED

Regd Office: 202, Sampada Complex, B/h. Tulsi Complex, Mithakhali Six Roads,
Navrangpura, Ahmedabad- 380009.

CIN: L01112GJ2011PLC067128

Whistle Blower Policy

Preface:

We, at **Mangalam Seeds Limited** believe in the conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behavior.

The Company is committed to developing a culture where it is safe for all employees to raise concerns about any poor or unacceptable practice and any event of misconduct.

Provision:

As per Section 177 of the Companies Act, 2013 and read with Rule 7 of the Companies (Meetings of Board and its Powers) Rules 2014, and Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The Company implemented a Whistle Blower Policy, by which all unethical and improper practices or wrongful conduct that may occur in the conduct of business of the Company when comes to the knowledge of an employee, can be brought to the attention of the concerned, including Managing Director and Audit Committee of the Board. The Policy provides a frame work by which a Whistle Blower has access to the top Management so that the wrongful conduct is brought to their attention, investigated and the concerned person punished.

Safeguard

The frame work will also provide adequate safe guards to the Whistle Blower who will act in good faith and prevent harassment and victimization to him. The identity of the Whistle Blower shall be kept confidential. Any other Employee assisting in the said investigation or

furnishing evidence shall also be protected to the same extent as the Whistle Blower. No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy

Policy

The Board of Directors of the Company has adopted a Vigil Mechanism/Whistle Blower Policy. This Policy intends to cover serious concerns that could have serious impact on the operations and performances of the Company and malpractices and events which have taken place or suspected to have taken place, misuse or abuse of authority, fraud or suspected fraud, violation of company rules, manipulations, negligence causing danger to public health and safety, misappropriation of monies and other matters or activity on account of which the interest of the Company is affected and formally reported by whistle blowers concerning its employees.

All the employees of the Company and various stakeholders of the Company are eligible to make protected disclosures under the policy in relation to matters concerning the Company.

Framework

As per the Policy the company has established a complete process of vigil mechanism which includes receipt and disposal of protected disclosures, the process of investigation, the way the decision takes place and reporting done, the secrecy and confidentiality and the protection of any kind of discrimination, harassment, victimization or any other unfair practices, to access to the Chairman of Audit Committee directly in exceptional cases, the administration and review of the policy etc.

As per the Policy the Company selected following person as a nodal officer;

Name:-

Mr. Pravinbhai M. Patel, Managing Director of the Company to whom the protected disclosure should be addressed;

Address:-

202, Sampada Complex, B/h. Tulsi Complex, Mithakhali Six Roads, Navrangpura, Ahmedabad-380009, Gujarat, India

Email id: pravin@mangalamseeds.com

The protected disclosure against the Nodal Officer should be addressed to the Chairman of the Company. The policy has been communicated to all employees and also posted on the website of the Company.