



B.K. BIRLA GROUP OF COMPANIES

MANGALAM CEMENT LTD.



MANGALAM CEMENT LTD.

MCL/SEC/2023-24

29th January, 2024

The Corporate Relation Department
The National Stock Exchange of India Ltd.
Exchange Plaza, 5th Floor
Plot No. C/1, G- Block
Bandra – Kurla Complex
Bandra (E), Mumbai-400051
Security Code: MANGLMCEM

The Corporate Relations Department
Department of Corporate Services
BSE Limited 25th Floor
Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai-400001
Scrip Code: 502157

ISIN: INE347A01017

MANGALAM CEMENT LIMITED - CIN: L26943RJ1976PLC001705

Sub: Reporting of Violation of Code of Conduct of the Company for Prohibition of Insider Trading

Ref: SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020

Dear Sir/ Madam,

We would like to inform that one of the Designated Person of Mangalam Cement Limited ("Company"), have traded in the equity shares of the Company in violation of the Code read with SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations").

In compliance with SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020, a report for the aforesaid by the Designated Person is annexed as "**Annexure - A**".

Kindly take the above information on record.

Yours faithfully,

For Mangalam Cement Limited

PAWAN KUMAR
THAKUR

Digitally signed by PAWAN
KUMAR THAKUR
Date: 2024.01.29 19:37:46 +05'30'

Pawan Kumar Thakur

Company Secretary & Compliance Officer

Encl: As above



B.K. BIRLA GROUP OF COMPANIES

MANGALAM CEMENT LTD.



MANGALAM CEMENT LTD.

Annexure-A

REPORT BY MANGALAM CEMENT LIMITED FOR VIOLATIONS RELATED TO CODE OF CONDUCT UNDER SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015.

[Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

| Sr. No. | Particulars | Details |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Name of the listed company/ Intermediary/Fiduciary | Mangalam Cement Limited |
| 2 | Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary | |
| 3 | A. Details of Designated Person (DP) | |
| | i. Name of the DP | Mr. Sunil Kumar Sachan |
| | ii. PAN of the DP | AFLPS5741N |
| | iii. Designation of DP | President (Operations) |
| | iv. Functional Role of DP | Operation Head |
| | v. Whether DP is Promoter or belongs to Promoter Group | No |
| | B. If Reporting is for immediate relative of DP | |
| | i. Name of the immediate relative of DP | Not Applicable |
| | ii. PAN of the immediate relative of DP | |
| | C. Details of transaction(s) | |
| | i. Name of the scrip | NSE Scrip: MANGLMCEM BSE Scrip: 502157 |
| | ii. No of shares traded and value (Rs.) (Date- wise) | As per the sheet(s) annexed as Annexure-B containing the details of Purchase and Sell of securities of the Company in violation of Code of Conduct for Prohibition of Insider Trading. |
| | D. In case value of trade(s) is more than Rs.10 lacs in a Calendar Quarter | |
| i. Date of intimation of trade(s) by concerned DP/ director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015 | 18 th January, 2024 | |
| ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015 | 19 th January, 2024 | |
| 4 | Details of violations observed under Code of Conduct | <ol style="list-style-type: none"> Trade executed in Securities of the Company without pre-clearance from the Compliance Officer. Trade was executed when Trading Window was opened. Execution of Contra-trade without making appropriate disclosures to the Compliance Officer. Failure to make disclosures within stipulated period as |

Regd. Office & Works : P.O. Aditya Nagar-326520, Morak, Distt. Kota (Raj.) CIN : L26943RJ1976PLC001705, Telefax : 07459 - 232156
Website : www.mangalamcement.com, E-mail : email@mangalamcement.com

Kota Office : Shop No. 20, 80 Feet Road, Opp. Sukhdham Colony, (Near SBI Bank) Kota - 324001(Rajasthan)
Mob : 9351468064, E-mail : mclcta@kappa.net.in

Delhi Office : 153, Leela Building (GF), Okhla Indl. Estate, Phase-III, New Delhi - 110020
Tel. No. : 011- 43539132, 43539133, 43539137 Fax : 011- 23421768
E-mail : delhi.purchase@mangalamcement.com, delhi.marketing@mangalamcement.com

Jaipur Office : 2nd Floor, Geejgarh Tower, Hawa-Sarak, Jaipur - 302 006 (Rajasthan)
Tel. : 0141 - 2218933, 2218931, E-mail : jaipur.marketing@mangalamcement.com



| Sr. No. | Particulars | Details |
|---------|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | provided under Regulation 7(2)(b) of the SEBI (PIT) Regulations, 2015 in relation to trade aggregating to more than Rs. 10 Lakhs. |
| 5 | Action taken by Listed company/ Intermediary/ Fiduciary | <ol style="list-style-type: none"> 1. Letter of warning issued to Mr. Sunil Kumar Sachan by Company Secretary & Compliance Officer for not dealing in the Securities of the Company, in future, in contravention of Company's Code of Conduct. 2. Imposition of monetary penalty of Rs. 5,59,070/- equivalent to profit earned by him on sale of securities of the Company for violation of Company's Code of Conduct of the Company. 3. Freezing of all existing securities of the Company held by him and his wife namely Smt Vibha Sachan for a period of one year w.e.f 27th January, 2024 till 26th January, 2025. 4. Disgorgement of Profits: The entire profit earned by him i.e INR 5,59,070/- in dealing with the securities of the Company, disgorged for remittance to for credit to SEBI-IPEF. |
| 6 | Reasons recorded in writing for taking action stated above | Mr. Sunil Kumar Sachan has admitted that the trades executed by him in the securities of the Company in violation of the Code read with SEBI ("PIT Regulations"), were unintentional and solely because of ignorance without any malafide intent and his failure in understanding the nitty gritty of the framework of Code. |
| 7 | Details of the previous instances of violations, if any, since last financial year | First time identification of violation of the Code and SEBI (PIT), Regulations. |



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MANGALAM CEMENT LTD.

| Sr. No. | Particulars | Details | | | | | | | | | | | | |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|------------------------|----------------------------------------------------------|--------------------------------------|------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------------------------------------------------------------|--------------------|------------|-----------------------------|--------------|--|
| 8 | If any amount collected for Code of Conduct violation(s) | The Audit Committee directed Mr. Sunil Kumar Sachan to deposit entire amount of profit earned by him i.e INR 5,59,070/- and imposition of equivalent amount of monetary penalty for profit earned by him for sale of Company Security i.e Rs. 5,59,070/- aggregating to Rs. 11,18,140/- have transferred to SEBI-IPEF on 29 th January, 2024. | | | | | | | | | | | | |
| | i. Mode of transfer to SEBI - IPEF (Online/Demand Draft) | - ONLINE (RTGS) | | | | | | | | | | | | |
| | ii. Details of transfer/payment In case of Online: | | | | | | | | | | | | | |
| | <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Mangalam Cement Ltd (on behalf of Mr Sunil Kumar Sachan)</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>HDFC Bank D-51, Siddi Vinayak, Ashok Marg, G- scheme, Jaipur 302001, Rajasthan A/C No:00542320005215</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>RTGS Dr-ICIC0000103-SEBI INVESTOR PROTECTION AND-JAIPUR WBO- HDFCR52024012974634951</td> </tr> <tr> <td>Transaction date</td> <td>29-01-2024</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>11, 18,140/-</td> </tr> </tbody> </table> | Particulars | Details | Name of the transferor | Mangalam Cement Ltd (on behalf of Mr Sunil Kumar Sachan) | Bank Name, branch and Account number | HDFC Bank D-51, Siddi Vinayak, Ashok Marg, G- scheme, Jaipur 302001, Rajasthan A/C No:00542320005215 | UTR/Transaction reference Number | RTGS Dr-ICIC0000103-SEBI INVESTOR PROTECTION AND-JAIPUR WBO- HDFCR52024012974634951 | Transaction date | 29-01-2024 | Transaction Amount (in Rs.) | 11, 18,140/- | |
| Particulars | Details | | | | | | | | | | | | | |
| Name of the transferor | Mangalam Cement Ltd (on behalf of Mr Sunil Kumar Sachan) | | | | | | | | | | | | | |
| Bank Name, branch and Account number | HDFC Bank D-51, Siddi Vinayak, Ashok Marg, G- scheme, Jaipur 302001, Rajasthan A/C No:00542320005215 | | | | | | | | | | | | | |
| UTR/Transaction reference Number | RTGS Dr-ICIC0000103-SEBI INVESTOR PROTECTION AND-JAIPUR WBO- HDFCR52024012974634951 | | | | | | | | | | | | | |
| Transaction date | 29-01-2024 | | | | | | | | | | | | | |
| Transaction Amount (in Rs.) | 11, 18,140/- | | | | | | | | | | | | | |
| | In case of Demand Draft (DD): | | | | | | | | | | | | | |
| | <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td>NA</td> </tr> <tr> <td>DD Number</td> <td>NA</td> </tr> <tr> <td>DD date</td> <td>NA</td> </tr> <tr> <td>DD amount (in Rs.)</td> <td>NA</td> </tr> </tbody> </table> | Particulars | Details | Bank Name and branch | NA | DD Number | NA | DD date | NA | DD amount (in Rs.) | NA | | | |
| Particulars | Details | | | | | | | | | | | | | |
| Bank Name and branch | NA | | | | | | | | | | | | | |
| DD Number | NA | | | | | | | | | | | | | |
| DD date | NA | | | | | | | | | | | | | |
| DD amount (in Rs.) | NA | | | | | | | | | | | | | |
| 9 | Any other relevant information | | | | | | | | | | | | | |

Date : 29-01- 2024

Place : Kolkata

Yours faithfully,

For Mangalam Cement Limited

PAWAN KUMAR
THAKURDigitally signed by PAWAN
KUMAR THAKUR
Date: 2024.01.29 19:38:40 +05'30'

PAN: ADWPT2236N

Pawan Kumar Thakur

E-mail ID: pawan.thakur@mangalamcement.com



B.K. BIRLA GROUP OF COMPANIES

MANGALAM CEMENT LTD.



MANGALAM CEMENT LTD.

Annexure-B

| SL. No. | Date of Transaction | No of Equity Shares traded (BUY) | Price (in INR) | Value of trade (in INR) |
|---------|---------------------|----------------------------------|----------------|-------------------------|
| 1 | 01-09-2023 | 50 | 352.15 | 17607.50 |
| 2 | 01-09-2023 | 25 | 349.30 | 8732.50 |
| 3 | 04-09-2023 | 25 | 377.50 | 9437.50 |
| 4 | 04-09-2023 | 50 | 371.00 | 18550.00 |
| 5 | 04-09-2023 | 100 | 368.00 | 36800.00 |
| 6 | 04-09-2023 | 50 | 368.00 | 18400.00 |
| 7 | 04.09.2023 | 50 | 369.00 | 18450.00 |
| 8 | 04.09.2023 | 25 | 369.00 | 9225.00 |
| 9 | 05.09.2023 | 50 | 368.00 | 18400.00 |
| 10 | 06.09.2023 | 100 | 368.00 | 36800.00 |
| 11 | 07.09.2023 | 50 | 365.00 | 18250.00 |
| 12 | 13.09.2023 | 100 | 360.45 | 36045.00 |
| 13 | 13.09.2023 | 100 | 360.00 | 36000.00 |
| 14 | 21.09.2023 | 50 | 360.00 | 18000.00 |
| 15 | 21.09.2023 | 25 | 360.50 | 9012.50 |
| 16 | 21.09.2023 | 50 | 362.00 | 18100.00 |
| 17 | 26.09.2023 | 200 | 367.00 | 73400.00 |
| 18 | 27.09.2023 | 100 | 363.00 | 36300.00 |
| 19 | 28.09.2023 | 200 | 367.00 | 73400.00 |
| 20 | 06.11.2023 | 100 | 405.10 | 40510.00 |
| 21 | 06.11.2023 | 100 | 407.60 | 40760.00 |
| 22 | 13.11.2023 | 50 | 417.70 | 20885.00 |
| 23 | 13.11.2023 | 6 | 418.00 | 2508.00 |
| 24 | 13.11.2023 | 50 | 418.25 | 20912.50 |
| 25 | 14.11.2023 | 100 | 423.50 | 42350.00 |
| 26 | 14.11.2023 | 100 | 422.55 | 42255.00 |
| 27 | 14.11.2023 | 50 | 422.90 | 21145.00 |
| 28 | 14.11.2023 | 38 | 422.98 | 16073.24 |
| 29 | 15.11.2023 | 1000 | 423.27 | 423270.00 |
| 30 | 16.11.2023 | 100 | 416.10 | 41610.00 |
| 31 | 16.11.2023 | 200 | 417.00 | 83400.00 |
| 32 | 16.11.2023 | 200 | 417.50 | 83500.00 |
| 33 | 16.11.2023 | 75 | 418.00 | 31350.00 |
| 34 | 16.11.2023 | 100 | 419.15 | 41915.00 |
| 35 | 16.11.2023 | 500 | 420.75 | 210375.00 |
| 36 | 22.11.2023 | 151 | 415.10 | 62680.10 |
| 37 | 24.11.2023 | 200 | 447.00 | 89400.00 |
| 38 | 24.11.2023 | 200 | 451.00 | 90200.00 |
| 39 | 24.11.2023 | 200 | 452.85 | 90570.00 |
| 40 | 29.11.2023 | 155 | 481.70 | 74663.50 |
| 41 | 29.11.2023 | 157 | 481.40 | 75579.80 |
| 42 | 29.11.2023 | 111 | 482.20 | 53524.20 |
| 43 | 29.11.2023 | 121 | 484.20 | 58588.20 |
| 44 | 29.11.2023 | 171 | 484.10 | 82781.10 |
| 45 | 29.11.2023 | 157 | 486.00 | 76302.00 |
| 46 | 29.11.2023 | 111 | 487.05 | 54062.55 |
| 47 | 29.11.2023 | 177 | 491.60 | 87013.20 |
| 48 | 29.11.2023 | 200 | 492.55 | 98510.00 |
| 49 | 29.11.2023 | 500 | 494.00 | 247000.00 |
| 50 | 29.11.2023 | 151 | 487.89 | 73671.39 |
| 51 | 01.12.2023 | 121 | 504.00 | 60984.00 |
| 52 | 04.12.2023 | 51 | 497.00 | 25347.00 |
| 53 | 04.12.2023 | 75 | 497.00 | 37275.00 |
| 54 | 04.12.2023 | 101 | 497.50 | 50247.50 |

PAWAN KUMAR THAKUR

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Date: 2024.01.29 19:40:56 +05'30'

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B.K. BIRLA GROUP OF COMPANIES

MANGALAM CEMENT LTD.



MANGALAM CEMENT LTD.

| SL. No. | Date of Transaction | No of Equity Shares traded (BUY) | Price (in INR) | Value of trade (in INR) |
|---------|---------------------|----------------------------------|----------------|-------------------------|
| 55 | 04.12.2023 | 81 | 498.50 | 40378.50 |
| 56 | 04.12.2023 | 85 | 503.00 | 42755.00 |
| 57 | 04.12.2023 | 77 | 505.10 | 38892.70 |
| 58 | 04.12.2023 | 77 | 506.50 | 39000.50 |
| 59 | 04.12.2023 | 121 | 505.75 | 61195.75 |
| 60 | 04.12.2023 | 151 | 507.95 | 76700.45 |
| 61 | 06.12.2023 | 157 | 493.50 | 77479.50 |
| 62 | 06.12.2023 | 51 | 494.45 | 25216.95 |
| 63 | 06.12.2023 | 93 | 495.40 | 46072.20 |
| 64 | 06.12.2023 | 127 | 495.20 | 62890.40 |
| 65 | 06.12.2023 | 155 | 495.45 | 76794.75 |
| 66 | 06.12.2023 | 157 | 497.00 | 78029.00 |
| 67 | 06.12.2023 | 155 | 494.05 | 76577.75 |
| 68 | 06.12.2023 | 77 | 494.90 | 38107.30 |
| 69 | 06.12.2023 | 132 | 495.20 | 65366.40 |
| 70 | 06.12.2023 | 157 | 497.00 | 78029.00 |
| 71 | 06.12.2023 | 207 | 497.00 | 102879.00 |
| 72 | 06.12.2023 | 177 | 496.20 | 87827.40 |
| 73 | 11.12.2023 | 100 | 537.10 | 53710.00 |
| 74 | 11.12.2023 | 100 | 538.00 | 53800.00 |
| 75 | 11.12.2023 | 100 | 539.10 | 53910.00 |
| 76 | 11.12.2023 | 200 | 540.50 | 108100.00 |
| 77 | 12.12.2023 | 177 | 535.10 | 94712.70 |
| 78 | 12.12.2023 | 142 | 536.40 | 76168.80 |
| 79 | 12.12.2023 | 151 | 533.00 | 80483.00 |
| 80 | 12.12.2023 | 105 | 537.00 | 56385.00 |
| 81 | 12.12.2023 | 127 | 531.20 | 67462.40 |
| 82 | 12.12.2023 | 151 | 532.83 | 80457.33 |
| 83 | 15.12.2023 | 132 | 658.00 | 86856.00 |
| 84 | 15.12.2023 | 173 | 631.93 | 109323.89 |
| 85 | 15.12.2023 | 57 | 631.20 | 35978.40 |
| 86 | 15.12.2023 | 95 | 631.00 | 59945.00 |
| 87 | 15.12.2023 | 125 | 611.00 | 76375.00 |
| 88 | 15.12.2023 | 157 | 607.90 | 95440.30 |
| 89 | 18.12.2023 | 45 | 612.60 | 27567.00 |
| 90 | 18.12.2023 | 97 | 614.70 | 59625.90 |
| 91 | 18.12.2023 | 79 | 617.70 | 48798.30 |
| 92 | 18.12.2023 | 107 | 613.68 | 65663.76 |
| 93 | 18.12.2023 | 77 | 621.10 | 47824.70 |
| 94 | 18.12.2023 | 127 | 623.70 | 79209.90 |
| 95 | 18.12.2023 | 127 | 631.00 | 80137.00 |
| 96 | 20.12.2023 | 30 | 643.00 | 19290.00 |
| 97 | 20.12.2023 | 200 | 641.00 | 128200.00 |
| 98 | 21.12.2023 | 100 | 660.90 | 66090.00 |
| 99 | 22.12.2023 | 132 | 697.00 | 92004.00 |
| 100 | 22.12.2023 | 22 | 691.50 | 15213.00 |
| 101 | 22.12.2023 | 90 | 691.00 | 62190.00 |
| 102 | 22.12.2023 | 127 | 711.10 | 90309.70 |
| 103 | 22.12.2023 | 157 | 705.00 | 110685.00 |
| 104 | 26.11.2023 | 27 | 687.00 | 18549.00 |
| 105 | 26.11.2023 | 127 | 687.00 | 87249.00 |
| 106 | 26.11.2023 | 105 | 688.48 | 72290.40 |
| 107 | 26.11.2023 | 121 | 684.70 | 82848.70 |
| 108 | 26.11.2023 | 73 | 687.00 | 50151.00 |
| | TOTAL | 13578 | | 6769325.01 |

PAWAN KUMAR THAKUR

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| SL. No. | Date of Transaction | No of Equity Shares traded (SELL) | Price (in INR) | Value of trade (in INR) |
|---------|---------------------|-----------------------------------|----------------|-------------------------|
| 1 | 16.11.2023 | 200 | 420.72 | 84144.00 |
| 2 | 23.11.2023 | 500 | 429.00 | 214500.00 |
| 3 | 29.11.2023 | 500 | 487.96 | 243980.00 |
| 4 | 06.12.2023 | 300 | 507.50 | 152250.00 |
| 5 | 12.12.2023 | 300 | 549.50 | 164850.75 |
| 6 | 13.12.2023 | 100 | 560.36 | 56036.00 |
| 7 | 13.12.2023 | 125 | 560.36 | 70045.00 |
| 8 | 13.12.2023 | 50 | 560.56 | 28018.00 |
| 9 | 13.12.2023 | 25 | 560.36 | 14009.00 |
| 10 | 13.12.2023 | 200 | 560.36 | 112072.00 |
| 11 | 18.12.2023 | 100 | 624.40 | 62440.00 |
| 12 | 19.12.2023 | 200 | 640.25 | 128050.00 |
| 13 | 20.12.2023 | 200 | 655.00 | 131000.00 |
| 14 | 21.12.2023 | 100 | 677.00 | 67700.00 |
| 15 | 21.12.2023 | 100 | 659.04 | 65904.00 |
| 16 | 26.12.2023 | 100 | 700.03 | 70003.00 |
| 17 | 27.12.2023 | 8 | 705.38 | 5643.00 |
| 18 | 27.12.2023 | 200 | 705.38 | 141075.00 |
| 19 | 27.12.2023 | 100 | 706.38 | 70537.50 |
| 20 | 28.12.2023 | 105 | 711.74 | 74732.70 |
| | TOTAL | 3513.00 | | 19,56,989.95 |

PAWAN
KUMAR
THAKUR

Digitally signed by
PAWAN KUMAR
THAKUR
Date: 2024.01.29
19:42:39 +05'30'

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