



**Date: August 06, 2025**

To

**The Manager, Listing Department  
National Stock Exchange of India Ltd**  
Exchange Plaza, Plot No. C/1, G Block,  
Bandra-Kurla Complex,  
Bandra (East), Mumbai 400 051.

**Scrip Code: 544280**

**Subject: Reporting of violations under SEBI (Prohibition of Insider Trading) Regulations, 2015.**

This is with reference to the Company's Code of Conduct to regulate, monitor and report trading by Designated Persons ("**Company's Insider Trading Code of Conduct**") as per the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find enclosed herewith the report related to the violation of Company's Insider Trading Code of Conduct, in the format as prescribed by SEBI vide its Master Circular on Surveillance of Securities Market dated September 23, 2024.

You are requested to take the same on record.

**Thanking you,  
Yours faithfully,  
For Afcons Infrastructure Limited**

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**Gaurang Parekh**  
**Company Secretary and Compliance Officer**  
**Membership No.: F8764**  
**Email ID: [compliance\\_pit@afcons.com](mailto:compliance_pit@afcons.com)**  
**Place: Mumbai**  
**Encl.: as stated above**



Report by Afcons Infrastructure Limited for violation 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	Afcons Infrastructure Limited																				
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company																				
3	<b>A. Details of Designated Person (DP)</b>																					
	i. Name of the DP	Ezhilarasan Sadhasivam																				
	ii. PAN of the DP	AWD*****Q																				
	iii. Designation of DP	Vice President																				
	iv. Functional Role of DP	Operations																				
	v. Whether DP is Promoter or belongs to Promoter Group	No																				
	<b>B. If Reporting is for immediate relative of DP</b>																					
	i. Name of the immediate relative of DP	Not Applicable																				
	ii. PAN of the immediate relative of DP	Not Applicable																				
	<b>C. Details of transaction(s)</b>																					
	i. Name of the scrip	BSE Scrip: 544280 NSE Symbol: AFCONS																				
	ii. No of shares traded and value (₹) (Date-wise)	<table border="1"><thead><tr><th>Date of Trading</th><th>No. of Shares</th><th>Trade Type</th><th>Price (₹)</th><th>Total (₹)</th></tr></thead><tbody><tr><td>18/06/2025</td><td>1,184</td><td>Sell</td><td>442.4736</td><td>5,23,888.74</td></tr><tr><td>26/06/2025</td><td>1,199</td><td>Sell</td><td>439.6951</td><td>5,27,194.42</td></tr><tr><td>27/06/2025</td><td>2,398</td><td>Sell</td><td>443.4450</td><td>10,63,381.11</td></tr></tbody></table>	Date of Trading	No. of Shares	Trade Type	Price (₹)	Total (₹)	18/06/2025	1,184	Sell	442.4736	5,23,888.74	26/06/2025	1,199	Sell	439.6951	5,27,194.42	27/06/2025	2,398	Sell	443.4450	10,63,381.11
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	<b>D. In case value of trade(s) is more than ₹10 lacs in a calendar quarter</b>																					
	i. Date of intimation of trade(s) by concerned DP/ director/ promoter/promoter group to Company under Regulation 7 of SEBI (PIT) Regulations, 2015	Not required as per SEBI Circular no. SEBI/HO/ISD/ISD/CIRP/2021/617 dated August 13,2021																				
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015																					

Afcons Infrastructure Limited

Regd. Office: Afcons House, 16, Shah Industrial Estate, Veera Desai Road, Azad Nagar, Andheri(W), Mumbai - 400 053, India, Tel.: +91-22-6719 1000, Email: secretarial@afcons.com  
www.afcons.com | CIN No.: L45200MH1976PLC019335

4	Details of violations observed under Code of Conduct	<p>Mr. Ezhilarasan Sadhasivam has sold Equity Shares of the Company (as mentioned in 3(C) (ii) above) of cumulative value in excess of Rs.10 lacs in a calendar quarter without obtaining pre-clearance.</p> <p>Further, Mr. Ezhilarasan failed to submit necessary disclosures as per the SEBI (PIT) Regulations, 2015 and Company's Insider Trading Code of Conduct, with respect to Sale of Equity Shares, within the statutory timelines.</p>																			
5	Action taken by Listed company/ <del>Intermediary</del> / <del>Fiduciary</del>	Pursuant to the decision of the Disciplinary Committee constituted under Company's Insider Trading Code of Conduct, the Company has issued warning to Mr. Ezhilarasan to strictly adhere as per the statutory requirements henceforth and levied a penalty of Rs. 5,000/- after taking into account the relevant facts and in terms of the provisions of Company's Insider Trading Code of Conduct.																			
6	Reasons recorded in writing for taking action stated above	<p>Following points have been considered while taking action in terms of the Company's Insider Trading Code of Conduct:</p> <p>(i) Mr. Ezhilarasan was not in possession of any Unpublished Price Sensitive Information ("UPSI").</p> <p>(ii) Mr. Ezhilarasan traded in the equity shares of the Company when the Trading Window was open.</p>																			
7	Details of the previous instances of violations, if any, since last financial year	None																			
8	If any amount collected for Code of Conduct violation(s)																				
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online																			
	<p>ii. Details of transfer/payment: Not Applicable</p> <p>In case of Online:</p> <table border="1" data-bbox="321 1224 1044 1518"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Ezhilarasan Sadhasivam</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>Kotak Mahindra Bank Mayiladuthurai AC No: 9411422159</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>250806238881951</td> </tr> <tr> <td>Transaction date</td> <td>06/08/2025</td> </tr> <tr> <td>Transaction Amount (in ₹)</td> <td>Rs. 5,005/-</td> </tr> </tbody> </table> <p>In case of Demand Draft (DD):</p> <table border="1" data-bbox="321 1581 1036 1759"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td rowspan="4">Not Applicable</td> </tr> <tr> <td>DD Number</td> </tr> <tr> <td>DD date</td> </tr> <tr> <td>DD amount (in ₹)</td> </tr> </tbody> </table>		Particulars	Details	Name of the transferor	Ezhilarasan Sadhasivam	Bank Name, branch and Account number	Kotak Mahindra Bank Mayiladuthurai AC No: 9411422159	UTR/Transaction reference Number	250806238881951	Transaction date	06/08/2025	Transaction Amount (in ₹)	Rs. 5,005/-	Particulars	Details	Bank Name and branch	Not Applicable	DD Number	DD date	DD amount (in ₹)
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9	Any other relevant information	Not Applicable																			