

June 22, 2022

To  
The Manager  
The Department of Corporate Services  
BSE Limited  
Floor 25, P. J. Towers,  
Dalal Street, Mumbai – 400 001

To  
The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (East), Mumbai – 400 051

**Scrip Code : 533271****Scrip Symbol : ASHOKA Eq.****Sub: Report for violation related to the Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”)**

Ashoka Buildcon Limited (“the Company”) is a company having its equity shares listed on BSE Limited and National Stock Exchange of India Limited since October 14, 2010. As a listed Company, the company is committed to follow applicable regulatory framework and also complies with corporate governance standards.

As a part of Company’s regulatory compliance, it has formulated and implemented the Code of Conduct for prohibition of insider trading (“Code of Conduct”) in accordance with Regulation 9(1) of the PIT Regulations. By virtue of this Code of Conduct, the Company has adopted standards set out in Schedule B of the PIT Regulations to regulate, monitor and report trading by its Designated Persons and their immediate relatives.

However, it has recently come to our knowledge / understanding that Mr. Jitendra Hariramani, one of the Designated Persons has violated certain terms of the Code of Conduct of PIT Regulations.

In light of the above, we are hereby filing a report on this violation of the Code of Conduct of PIT Regulations in the manner prescribed under the SEBI Circular vide Ref. No. SEBI/HO/ISD/CIR/P/2019/82 dated July 19, 2019 read with clause 13 of Schedule B of PIT Regulations. A copy of the report indicating details of violations of the code of conduct by the designated person has been enclosed herewith as **Annexure A**.

We assure you that, as the company is aware of its regulatory obligations in the securities market, the company takes prompt action against any violation of its internal policies. Accordingly, as per the Code of Conduct of the Company, on becoming aware of this incident, the Company, as an immediate step, reported the violation to the Managing Director of the Company. An internal inquiry was conducted for the matter in the presence of the Managing Director, Chief Financial Officer and the undersigned.





He has been informed to deposit Rs.1,000/- as a fine for violation. Details of payment have been enclosed in Annexure A.

We request you to condone this one off incident of violation of code of conduct of PIT Regulations by Designated Person which happened inadvertently without the knowledge and instructions of Designated Person. He has resigned from the Company. However, he is treated as Insider as per SEBI PIT Regulations for 6 months post resignation, which he was not aware. Hence the trade was happened of only 700 shares.

Kindly maintain the confidentiality of the contents of this letter and the enclosed report.

Yours faithfully,  
**For Ashoka Buildcon Limited**

**(Manoj A. Kulkarni)**  
Company Secretary

ICSI M. No. : FCS – 7377

3, Dattakripa Apt., Kathe Galli, Nasik – 422 011



**Encl.: Annexure A**

**Annexure A**

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Ashoka Buildcon Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	✓
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Jitendra Hariramani
	ii. PAN of the DP	AACPH1965P
	iii. Designation of DP	Designated Person
	Member of Promoter Group	No
	iv. Functional Role of DP	He is an ex-employee Since 31-12-2021
	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	
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	Ashoka Buildcon Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	Bought 500 shares on 19.05.22 for Rs.36,572.90 Bought 200 shares on 24.05.22 for Rs.14,444.00
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	Not Applicable
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	N.A. Yes
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	Details of violations observed under Code of Conduct	Trading during window closure period
5	Action taken by Listed company/ Intermediary/ Fiduciary	An enquiry was held and an action has been taken as per Code of Conduct to pay fine of Rs.1,000/- to be deposited in SEBI IEPF Account.
6	Reasons recorded in writing for taking action stated above	Purchased shares during window closure period
7	Details of the previous instances of violations, if any, since last financial year	N.A.
8	If any amount collected for Code of Conduct violation(s)	Rs.1,000/- as fine for violation of Code of Conduct
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online (Via IMPS) to 012210210000008 SEBI IEPF
	ii. Details of transfer/payment	
	In case of Online :	
	<b>Particulars</b>	<b>Details</b>
	Name of the transferor	Jitendra Hariramani
	Bank Name, branch	RBL Bank Limited
	Account number	30900727545
	UTR/Transaction reference Number	IMPS Ref. No. 215916919152
	Transaction date	June 8, 2022
	Transaction Amount (in Rs.)	Rs.1,000/-
	In case of Demand Draft :	N.A.
	<b>Particulars</b>	<b>Details</b>
	Bank Name and branch	
	DD Number	
	DD date	
	DD amount (in Rs.)	
9	Any other relevant information	Fine of Rs. 1,000/- for violation of Code of Conduct has been deposited in SEBI IEPF Account

