

4th April, 2022

BSE Limited

Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai – 400 001.
Scrip Code: 532830

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block G
Bandra Kurla Complex, Bandra (East)
Mumbai – 400 051.
Trading Symbol: ASTRAL

Dear Sir/Madam,

Sub.: Violation under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 by Designated person

In term of SEBI Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23rd July, 2020, please find attached herewith Report by the Company for violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Kindly take the same on your record.

Thanking you,

Yours faithfully,

For Astral Limited



Krunal Bhatt
Company Secretary



**Report by Astral 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	Astral Limited
2.	Please tick appropriate checkbox Reporting in capacity of : ✓ Listed Company	Listed Company
3.	A. Details of Designated Person	
	Name of DP	Deepa Naresh Asrani
	PAN of DP	APXPA2123C
	Designation of DP	Asst. Manager - Accounts
	Functional Role of DP	Working in Accounts department of the Company.
	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	NA
	PAN of the immediate relative of DP	NA
	C. Details of transactions (s)	
	Name of the scrip	Astral Limited – Equity Shares
	No of shares traded and value (Rs.) (Date- wise)	Market Sell of 5 equity shares on 22 nd March, 2022. Value - Rs. 10,000/-
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter	
	Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015.	NA since value is less than Rs. 10 Lacs
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA since value is less than Rs. 10 Lacs
4.	Details of violations observed under Code of Conduct	Contra trade of 5 equity shares
5.	Action taken by Listed company	The Company issued warning to the Designated Person and imposed penalty equivalent to contra trade profit of Rs. 928/- and asked the DP to deposit total amount of Rs. 1856 to SEBI IPEF.
6.	Reasons recorded in writing for taking action stated above	The Compliance Office on becoming aware of the transaction through weekly report received from Registrars & Share Transfer Agent enquired about the transaction from the Designated Person about the transaction. The Designated Person informed the Compliance Officer that the trade was executed by him inadvertently. The Designated Person also informed and declared that he was not in possession of any unpublished price sensitive information about the

Astral Limited (Formerly known as Astral Poly Technik Limited)

Registered & Corporate Office: 207/1, 'Astral House', B/h Rajpath Club, off S. G. Highway, Ahmedabad - 380059, Gujarat, India.

P: +91 79 6621 2000 | **F:** +91 79 6621 2121 | **W:** astralpipes.com | **CIN:** L25200GJ1996PLC029134



		Company or its securities at the time execution of the aforesaid trade. Considering the above submissions by the Designated Person and being the first time violation, The Company issued warning to the Designated Person and imposed penalty equivalent to contra trade profit of Rs. 928/- and asked the DP to deposit total amount of Rs. 1856 to SEBI IPEF..												
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)													
	Mode of transfer to SEBI – IEPF (Online/Demand Draft)	Online												
	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>Mrs. Deepa Naresh Asrani (Designated Person)</td></tr> <tr> <td>Bank Name, branch and Account number</td><td>HDFC Bank, (A/c No 50100118641081)</td></tr> <tr> <td>UTR/Transaction reference Number</td><td>209417106697</td></tr> <tr> <td>Transaction date</td><td>4th April, 2022</td></tr> <tr> <td>Transaction Amount (in Rs.)</td><td>Rs.1856</td></tr> </tbody> </table>	Particulars	Details	Name of the transferor	Mrs. Deepa Naresh Asrani (Designated Person)	Bank Name, branch and Account number	HDFC Bank, (A/c No 50100118641081)	UTR/Transaction reference Number	209417106697	Transaction date	4 th April, 2022	Transaction Amount (in Rs.)	Rs.1856	
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9.	Any other relevant information													

For Astral Limited



Krunal Bhatt

Compliance Officer

E-mail : co@astralpipes.com



Date : 4th April, 2022

Place : Ahmedabad

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