

14th January, 2022

BSE Limited

P.J Towers
Dalal Street
Mumbai – 400001

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block-G,
Bandra – Kurla Complex, Bandra (E)
Mumbai – 400051

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 records.

Thanking You,

For, Astral Limited

A handwritten signature in blue ink, appearing to read "Krunal Bhatt".

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 ☐ Intermediary ☐ Fiduciary	Listed Company
3.	A. Details of Designated Person (DP)	
	Name of DP	Mr. Yogesh Shah
	PAN of DP	AACPS2006G
	Designation of DP	Deputy General Manager
	Functional Role of DP	Working in Marketing department of the Company.
	Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	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)	Pledge - 1000 shares on 3 rd January, 2022. (Rs. 22,81,800)
	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.	N.A
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Reported through system driven disclosure.
4.	Details of violations observed under Code of Conduct	“Margin Pledge” of 1000 equity shares of the Company in favour of Broker without pre-clearance and during closure of trading of window.
5.	Action taken by Listed company	The Company imposed penalty of Rs. 50,000/- to the Designated Person and asked him to deposit the penalty to SEBI IPEF.
6.	Reasons recorded in writing for taking action stated above	The Compliance Office on becoming aware of the transaction through weekly benpose data enquired about the transaction from the Designated Person.

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

		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 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 Designated Person was issued warning and was imposed fine of Rs. 50,000/-. He was further informed to deposit the said fine amount to SEBI IPEF Bank Account which he deposited on 13th January, 2022.
7.	Details of the previous instances of violations, if any, since last financial year	NA
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 :	
	Particulars	Details
	Name of the transferor	Mr.Yogesh Shah
	Bank Name, branch and Account number	HDFC Bank
	UTR/Transaction reference Number	N013221793681861
	Transaction date	13 th January, 2022
	Transaction Amount (in Rs.)	Rs. 50,000
	In case of Demand Draft (DD):NA.	
	Particulars	Details
Bank Name and branch		
DD Number		
DD date		
DD amount (in Rs.)		
9.	Any other relevant information	NA

For Astral Limited



Krunal Bhatt
Compliance Officer

PAN : AHVPB4783F

E-mail : co@astralpipes.com

Date : 14th January, 2022

Place : Ahmedabad

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