

Date: 06-01-2025

To, National Stock Exchange of India Limited (“NSE”) Listing Department Exchange Plaza, C-1 Block G, Bandra Kurla Complex Bandra [E], Mumbai – 400051	To, BSE Limited (“BSE”) Listing Department Corporate Relationship Department Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001
NSE Scrip Symbol: AWFIS	BSE Scrip Code: 544181
ISIN: INE108V01019	ISIN: INE108V01019

SUBJECT: Report of violation related to Code of Conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”).

Ref.: SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 read with SEBI Circular No. SEBI/HO/GSD/TAD/P/CIR/2023/149 dated September 04, 2023

Dear Sir/Ma’am,

This is in continuation of our previous intimation dated 27th November 2024 regarding the violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015, related to the Company’s Code of Internal Procedures and Conduct for Regulating, Monitoring, and Reporting of Trading in Securities by Designated Persons.

We wish to inform you that the Designated Person, Ms. Anindita, was found to have engaged in a transaction that amounted to a Contra Trade, as it occurred within six months of her last sale of shares. Upon investigation by the Audit Committee, it was clarified that this violation was the result of an inadvertent error caused by a miscommunication between Ms. Anindita and her broker. Ms. Anindita has confirmed that she did not possess any Unpublished Price Sensitive Information (UPSI) at the time of the transaction, and the trades were based solely on publicly available information. Additionally, she incurred a loss rather than earning a profit from the trade.

As a result, the Audit Committee has deemed it appropriate to issue a caution letter as a response, emphasizing the importance of adhering to the PIT Regulations and ensuring that similar errors or violations do not occur in the future.

As required, we are submitting the enclosed report of this violation in the prescribed format (**Annexure-A**), as per SEBI’s Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, and SEBI Circular No. SEBI/HO/GSD/TAD/P/CIR/2023/149 dated September 04, 2023.

We request you to kindly take this on your record.

Thanking You,

For Awfis Space Solutions Limited

Amit Kumar
Company Secretary and Compliance Officer
M. No. A31237
Address: C-28 and 29, Kissan Bhawan, Qutub Institutional Area, New Delhi 110016

Corporate and Regd. Office

Awfis Space Solutions Limited
C-28-29, Kissan Bhawan, Qutab Institutional Area, New Delhi – 110016
www.awfis.com | Email: info@awfis.com | Phone: 011- 69000657
CIN: L74999DL2014PLC274236

Annexure - A

Report by Awfis Space Solution Limited (CIN: L74999DL2014PLC274236) for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

[For Intermediaries/ Fiduciaries: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Awfis Space Solutions Limited
2	<p><i>Please tick appropriate checkbox</i></p> <p>Reporting in capacity of :</p> <p><input type="checkbox"/> Listed Company</p> <p><input type="checkbox"/> Intermediary</p> <p><input type="checkbox"/> Fiduciary</p>	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Ms. Anindita Seal Sarkar
	ii. PAN of the DP	CDYPS5396G
	iii. Designation of DP	Vice President - Sales
	iv. Functional Role of DP	Sales
	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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	Equity Shares of Awfis Space Solutions Limited (Scrip Code: 544181/ Trading Symbol: AWFIS)
	ii. No of shares traded and value (Rs.) (Date- wise)	Details of Transaction as per Annexure-I
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter	

Sr. No.	Particulars	Details
	i. Date of intimation of trade(s) by concerned DP/director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA
4	Details of violations observed under Code of Conduct	Ms. Anandita Seal Sarkar purchased 25 shares without prior approval of the Compliance Officer as per Code of Conduct for Prevention of Insider Trading of the company which led to contra trade.
5	Action taken by Listed company/ Intermediary/ Fiduciary	Audit Committee's has decided that a caution letter be issued to Ms. Anindita regarding the violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015. The decision was based on the fact that no profit was earned from the transaction, and Ms. Anindita had no access to any Unpublished Price Sensitive Information (UPSI) at the time of the trade. The violation occurred due to an inadvertent error arising from a miscommunication between Ms. Anindita and her broker.
6	Reasons recorded in writing for taking action stated above	The decision was based on the fact that no profit was earned from the transaction, and Ms. Anindita had no access to any Unpublished Price Sensitive Information (UPSI) at the time of the trade. The violation occurred due to an inadvertent error arising from a miscommunication between Ms. Anindita and her broker.
7	Details of the previous instances of violations, if any, since last financial year	NIL
8	If any amount collected for Code of Conduct violation(s)-NIL	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	
	ii. Details of transfer/payment: In case of Online:	
Particulars	Details	

Name of Transferor	-
Bank Name, branch and Account number	-
UTR/Transaction reference Number	-
Transaction date	-
Transaction Amount (in Rs.)	-
In case of Demand Draft (DD):	
Particulars	Details
Bank Name and branch	-
DD Number	-
DD date	-
DD amount (in Rs.)	-
9	Any other relevant information

For Awfis Space Solutions Limited

Amit Kumar

Company Secretary and Compliance Officer

M. No. A31237

E-mail: cs.corp@awfis.com

Address: C-28 and 29, Kissan Bhawan, Qutub Institutional Area New Delhi 110016

Annexure-I**No of Shares Traded and value (date wise)**

Type of Transaction	Trade date	Quantity (No.)	Rate per unit (Rs.)	Value (Rs.)
Buy	30/09/2024	25	698.44	17,461