

# Antony Waste Handling Cell Limited

CIN: L90001MH2001PLC130485



Ref.: AW/SEC/NSE/2023-24/44

Date: August 19, 2023

To,  
Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, 5<sup>th</sup> Floor,  
Plot No.C-1, Block G, Bandra-Kurla Complex,  
Bandra (E), Mumbai 400 051

**Script Code: AWHCL**

Dear Madam/Sir,

Sub. : Reporting of Violation relating to Code of Conduct  
Ref. : Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulation")

With reference to the SEBI PIT Regulation read with SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/ 2020/135 dated July 23, 2020, we hereby report a violation of Code of Conduct for Prevention of Insider Trading of the Company, by member of the promoter group. Further, the required details of the violation as per the said circular is annexed herewith as **Annexure A**.

This is for your information and records please.

Thanking You,

Yours faithfully,  
For and on behalf of  
ANTONY WASTE HANDLING CELL LIMITED

HARSHADA RANE  
COMPANY SECRETARY & COMPLIANCE OFFICER  
A34268

Encl: a/a

Report by Antony Waste Handling Cell 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	Antony Waste Handling Cell Limited																				
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	<input checked="" type="checkbox"/> Listed Company																				
3	<b>A. Details of Designated Person (DP)</b>																					
	i. Name of the DP	Poulose Ouseph Kallarakkal																				
	ii. PAN of the DP	AAKPK4433H																				
	iii. Designation of DP	-																				
	iv. Functional Role of DP	-																				
	v. Whether DP is Promoter or belongs to Promoter Group	Member of Promoter group																				
	<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	<b>BSE : 543254   NSE : AWHCL</b>																				
	ii. No of shares traded and value (Rs.) (Date - wise)	<table border="1"> <thead> <tr> <th>Date</th> <th>Transaction</th> <th>No. of Shares</th> <th>Value (in ₹)</th> </tr> </thead> <tbody> <tr> <td>22-02-2023</td> <td>Buy</td> <td>334</td> <td>86,503</td> </tr> <tr> <td>11-05-2023</td> <td>Buy</td> <td>6</td> <td>1,619</td> </tr> <tr> <td>25-05-2023</td> <td>Buy</td> <td>700</td> <td>1,74,300</td> </tr> <tr> <td>27-06-2023</td> <td>Sell</td> <td>1040</td> <td>3,41,900</td> </tr> </tbody> </table>	Date	Transaction	No. of Shares	Value (in ₹)	22-02-2023	Buy	334	86,503	11-05-2023	Buy	6	1,619	25-05-2023	Buy	700	1,74,300	27-06-2023	Sell	1040	3,41,900
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	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>																					
	i. Date of intimation of trade(s) by concerned	Not Applicable																				
	ii. DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable																				

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	iii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	<b>Details of violations observed under Code of Conduct</b>	Execution of trade during the trading window closure and subsequently Contra Trade in shares of the Company by the member of promoter group.
5	<b>Action taken by Listed company/ Intermediary/ Fiduciary</b>	<p>The matter was referred to Audit Committee of the Company for its perusal and the same was pursued by the Audit Committee in its meeting dated August 11, 2023, and it has unanimously decided to take the following actions:</p> <ul style="list-style-type: none"><li>(i) Since this was first instance, it directed to issue a warning letter; and</li><li>(ii) Directed to disgorge the profit made i.e. ₹ 79,745/- to SEBI's IPEF; and</li><li>(iii) Imposed a penalty of ₹ 40,000 for the violations.</li></ul> <p>The total amount required to be transferred to SEBI's IPEF was ₹ 1,19,745/- (Rupees One Lakh Nineteen Thousand Seven Hundred and Forty-Five only).</p>
6	<b>Reasons recorded in writing for taking action stated above</b>	<p>Mr. Poullose has submitted that the transactions were inadvertent and not intentional. Since, he is not engaged in day-to-day affairs of the Company, it was evident that he was not in possession of any Unpublished Price Sensitive Information which can led to the transaction in the shares of the Company. The trades were purely a market exercise and the quantity traded was marginal.</p> <p>Considering the facts, the Audit Committee has taken the action as stated in the point 5 of this annexure.</p>
7	<b>Details of the previous instances of violations, if any, since last financial year</b>	This was the first instance.
8	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Payment
	ii. <b>Details of transfer/payment in case of Online:</b>	
	a) Name of the Transferor	Antony Waste Handling Cell Limited
	b) Bank Name, Branch	Bank of Baroda, Vashi Branch

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	c) Account Number	10430200001160
	d) UTR/Transaction reference Number	BARBD23231351388
	e) Transaction Date	August 19, 2023
	f) Transaction Amount (in ₹)	₹ 1,19,745/- (Rupees One Lakh Nineteen Thousand Seven Hundred and Forty-Five only)
	<b>In case of Demand Draft (DD):</b>	
	a) Bank and Branch	
	b) DD Number	
	c) DD Date	
	d) DD Amount (in Rs.)	
<b>9</b>	Any other relevant information	Nil

