

October 14, 2026

To,
Listing Department,
BSE Limited,
14th Floor, P.J. Towers, Dalal Street,
Mumbai – 400 001
Scrip Code: 544603

To,
Listing Department,
National Stock Exchange of India Limited,
Exchange Plaza, Bandra Kurla
Complex,
Bandra (E), Mumbai – 400 051
Symbol: GROWW

Dear Sir / Madam,

Sub.: Reporting of Violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

In terms of Company's Code of Conduct for Prohibition of Insider Trading ("Insider Trading Code") read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, we hereby submit a report in respect of violation of Insider Trading Code of the Company as per format specified in SEBI Master Circular no. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2024/126 dated September 23, 2024. The report is attached as **Annexure A**.

In compliance with the aforesaid regulation, the aforesaid information is also being made available on the Company's website i.e. www.groww.in.

Kindly take the same on record and oblige.

Thanking you,
Yours faithfully,

**For Billionbrains Garage Ventures Limited
(Formerly known as Billionbrains Garage Ventures Private Limited)**

ROSHAN
BHANUPRA
KASH DAVE

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ROSHAN
BHANUPRAKASH
DAVE
Date: 2026.10.14
16:44:57 +0530'

**Roshan Dave
Company Secretary and Compliance Officer**

Encl: As above

Billionbrains Garage Ventures Limited (Formerly known as *Billionbrains Garage Ventures Private Limited*)

Registered Office:

Vaishnavi Tech Park, South Tower, 3rd Floor, Survey No.16/1 and 17/2, Ambalipura Village, Varthur Hobli, Bellandur, Bangalore, Bangalore South, Karnataka, India, 560103

Annexure A

Report by Billionbrains Garage Ventures Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Billionbrains Garage Ventures Limited
2	Please tick appropriate checkbox Reporting in capacity of: ☐ Listed Company ☐ Intermediary ☐ Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Sankalp Yadav
	ii. PAN of the DP	*****0287B
	iii. Designation of DP	Finance (Manager)
	iv. Functional Role of DP	Business Finance
	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	Billionbrains Garage Ventures Limited Scrip Code: 544603 Symbol: GROWW
	ii. No of shares traded and value (Rs.) (Date-wise)	On August 26, 2026 – 2 (Two) equity shares bought aggregating to Rs. 393.16 On August 26, 2026 – 2 (Two) equity shares sold aggregating to Rs. 392.26

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Sr. No.	Particulars	Details
		On September 17, 2026 - 1 (One) equity share bought for Rs.191.83
	D. In case value of trade(s) is more than Rs. 10 lacs in a calendar quarter	
	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	Execution of Contra Trades in equity shares of the Company
5	Action taken by Listed company/ Intermediary Fiduciary	The Audit Committee noted an inadvertent contra trade purchase and sale of 2 (Two) equity shares on the same day, August 26, 2026) and a subsequent purchase of 1 (One) equity share on September 17, 2026, by Mr. Sankalp Yadav, a Designated Person ("DP"). During the quarter, Mr. Yadav was moved to another, non-critical team, and given his revised role, his continuance on the DP list post August 01, 2026 was not warranted. As the DP list is updated atleast twice a quarter, his name could not be removed before these trades took place, resulting in this reportable instance under the Company's Code of Conduct. The Committee further noted that no profit was disgorged, as the trades were executed in loss.
6	Reasons recorded in writing for taking action stated above	Execution of contra trade
7	Details of the previous instances of violations, if any, since last financial year	None

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8	If any amount collected for Code of Conduct violation(s)		NA
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)		
	ii. Details of transfer/payment In case of Online:		NA
	Particulars	Details	
	Name of the 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	
	Name of the transferor		
Bank Name, branch and Account number			
UTR/Transaction reference Number			
Transaction date			
Transaction Amount (in Rs.)			
9	Any other relevant information		None

Yours faithfully,

For Billionbrains Garage Ventures Limited
(Formerly known as Billionbrains Garage Ventures Private Limited)

ROSHAN BHANUPRAKASH
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 Digitally signed by ROSHAN BHANUPRAKASH
 Date: 2026.10.14 16:35:15 +05'30'

Name of Compliance Officer: Roshan Dave

PAN: *****1701G

E mail: corp.secretarial@groww.in

Date: 14.10.2026

Place: Bengaluru

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