

**February 16, 2023**

<b>National Stock Exchange of India Limited</b> Exchange Plaza, C-1, Block-G, Bandra Kurla Complex, Bandra (E), Mumbai - 400051  <b>NSE Symbol: CSLFINANCE</b>	<b>BSE Limited</b> Corporate Relationship Department Phiroze, Jeejeebhoy Towers Dalal Street, Mumbai-400001  <b>BSE Scrip Code: 530067</b>
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Dear Sir/ Ma'am,

**Sub: Reporting of violation under SEBI (Prohibition of Insider Trading) Regulations, 2015 (Sale of shares by the Broker without obtaining prior consent from the Designated Person).**

Pursuant to the captioned subject, we enclose herewith the report of violation related to Code of Conduct to report, monitor and regulate Insider Trading formulated under SEBI (Prohibition of Insider Trading) Regulations, 2015 as Annexure A prescribed by SEBI vide its Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

This is for your kind information and record.

Thanking you,

Yours Faithfully,  
For **CSL Finance Limited**

Ashok Kumar Kathuria  
Director  
(DIN: 01010305)

Date: 16.02.2023  
Place: Noida

**Encl: A/a**

**Annexure A**
**Report by CSL Finance 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]

<b>Sr. No.</b>	<b>Particulars</b>	<b>Details</b>
1	Name of the listed company/ Intermediary/Fiduciary	CSL Finance Limited
2	Please tick appropriate checkbox Reporting in capacity of: <ul style="list-style-type: none"> <li><input type="radio"/> Listed Company</li> <li><input type="radio"/> Intermediary</li> <li><input type="radio"/> Fiduciary</li> </ul>	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Rohit Gupta HUF
	ii. PAN of the DP	AAEHR7347M
	iii. Designation of DP	NA
	iv. Functional Role of DP	NA
	v. Whether DP is Promoter or belongs to Promoter Group	Yes
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	NA
	ii. PAN of the immediate relative of DP	NA
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	CSL Finance Limited NSE: CSLFINANCE, BSE : 530067

	ii. No of shares traded and value (Rs.) (Date-wise)	271 equity shares of CSL Finance Limited sold at value of Rs. 69,972/- on January 23, 2023.
	<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 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.	
4	Details of violations observed under Code of Conduct	a) Sale of shares of the Company during trading window closure. b) Prior approval not taken.
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The Company sought clarification from Designated Person on the violations and the same was responded on 15-02-2023.</p> <p>The Management of the Company issued warning against any future violation.</p> <p>The Designated Person stated that trade was executed during the trading window closure period by his broker- Sharekhan without his consent for meeting the margin shortfall requirements under their 5 days ageing automatic square-off process.</p>

		<p>The broker already had Rs. 3 Crore worth margin with him and in the past also whenever there was a shortfall in margin money, the amount was deposited on the very same day.</p> <p>This being a nominal amount, I have no idea why they had sold the shares without my permission and I will take necessary suitable actions against them.</p> <p>On and from 6<sup>th</sup> February, 2023 till 15<sup>th</sup> February, 2023, Mr. Gupta took continuous follow up with the representative of the broker- Sharekhan for selling the shares of the Company without his permission and advised the representative to acknowledge their mistake for which he has received an apology email from the Operation Manager- PCG of the broker which is enclosed herewith for your kind reference.</p>
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6	Reasons recorded in writing for taking action stated above	<p>Considering the fact that the violation was attributable to the negligence on the part of the broker and there was no malafide intent on part of the Designated Person.</p> <p>Non-disclosure of the transaction was inadvertent and not intentional.</p> <p>The quantity traded is marginal and no profit was booked as the trade was executed for meeting the margin shortfall requirements under their 5 days ageing automatic square-off process, therefore a warning letter was issued.</p> <p>This was the first violation on the part of Rohit Gupta HUF.</p>
7	Details of the previous instances of violations, if any, since last financial year	Nil (Very First instance)
8	If any amount collected for Code of Conduct violation(s)-	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	None
	ii. Details of transfer/payment  In case of Online:	NA

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

This is for your kind information and record.

Thanking you,

Yours Faithfully,  
For **CSL Finance Limited**

Ashok Kumar Kathuria  
Director  
(DIN: 01010305)

Date: 16.02.2023  
Place: Noida

**Fwd: Auto Square off CFL Finance Ltd (ROHIT GUPTA HUF-3015594)**

Rohit Gupta <guptarohit111@gmail.com>  
To: Shivam Sharma <shivam.sharma@cslfinance.in>

Wed, Feb 15, 2023 at 5:41 PM

Regards

Tamanna

----- Forwarded message -----

From: Lalit KANT <lalit.kant@sharekhanone.com>

Date: Wed, Feb 15, 2023 at 5:36 PM

Subject: Auto Square off CFL Finance Ltd (ROHIT GUPTA HUF-3015594)

To: guptarohit111@gmail.com <guptarohit111@gmail.com>

Cc: Pankaj SINGH <pankaj.singh@sharekhanone.com>, Anoop MEHRA <anoop.mehra@sharekhanone.com>, Kanika KOHLI <kanika.kohli@sharekhanone.com>

Dear Sir,

Greeting for the day!!!

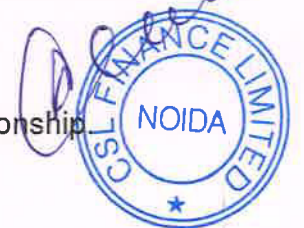
Hope this email finds you well and that you and your family are healthy and safe.

We sincerely apologies for the inconvenience caused to you due to the erroneous sale of 271 shares of CFL Finance Limited under our 5 days ageing automatic square-off process on January 23, 2023.

The same occurred due to an unforeseen operational glitch which has been identified and will be rectified shortly.

Kindly note that the shares were automatically selected based on a logic built into the system / market parameters. There was no intention or malice involved in specifically or manually selecting these shares.

We would once again like to extend our apologies for the inconvenience caused and look forward to a long and pleasant relationship.



**Lalit Kant**

**Operations Manager-PCG**

# 46, Pusa Road, 2nd Floor, TRDP House, Karol Bagh, New Delhi-110005

Email: [lalit.kant@sharekhanone.com](mailto:lalit.kant@sharekhanone.com) | Contact: 011-45117042 | +91 8976798125



**For Feedback and Escalations**

**Connect with:** Pankaj Kr. Singh, City Head-Delhi

**Email:** [pankaj.singh@sharekhanone.com](mailto:pankaj.singh@sharekhanone.com)

**Contact:** 011- 47250693 | +91 9811714611

