



October 16, 2024

**The Manager (Listing - CRD)**

**BSE Limited**

Phiroze Jeejeebhoy Tower,  
Dalal Street, Fort,  
Mumbai - 400 001.

**Scrip Code:** 533151

**The Manager (Listing Department)**

**National Stock Exchange of India Limited**

Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex, Bandra (East),  
Mumbai - 400 051.

**SYMBOL:** DBCORP

**ISIN:** INE950I01011

**Sub.: Reporting under Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015**

**Ref.: 1. Violation of Company's Code of Conduct to regulate, monitor and report trading by Insiders, Designated Persons and their Immediate Relatives**

**2. Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020**

Dear Sir/Madam,

In terms of the Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ('the SEBI PIT Regulations'), Company's Code of Conduct to regulate, monitor and report trading by Insiders, Designated Persons and their Immediate Relatives ('Company Code') and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of deviation / violation of the Company's Code by Mr. Nishit Jain, Designated Person, along with the action taken report by the Company thereon is enclosed to this letter.

We would like to submit that the reported case is indeed a violation of the Company's Code and SEBI PIT Regulations by Mr. Nishit Jain. He has informed the Company that he has inadvertently traded in excess of Rs. 10,00,000/- (Rupees Ten lakh only) over the calendar quarter without obtaining/completing the pre-clearance formalities and the same is unintentional and solely because of ignorance without any malafide intent. Further, he has committed not to recur the violation in future. Also, the said violation is not material in relation to the total paid-up equity share capital of the Company.

Accordingly, the matter was placed before the Audit Committee of the Company at its meeting held today i.e. on October 15, 2024 in line with the Company's Code and action is taken against Mr. Nishit Jain as advised by the Audit Committee.



**D. B. Corp Limited** CIN: L22210GJ1995PLC047208 Website: www.dbcorppltd.com E-mail: dbcs@dbcorp.in

Registered Office: Plot No. 280, Sarkhej-Gandhinagar Highway, Near YMCA Club, Makarba, Ahmedabad - 380 051, Gujarat, Tel.: 079 4908 8809

Head Office: Dwarka Sadan, 6, Press Complex, M.P. Nagar, Zone I, Bhopal - 462 011, Madhya Pradesh, Tel.: 0755 4730 000

Corporate Office: 501, 5<sup>th</sup> Floor, Naman Corporate Link, Opp. Dena Bank, C-31, G-Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400 051, Maharashtra, Tel.: 022 7157 7000



We attach herewith the report on violation/deviation in prescribed format for your information and records.

Thanking you,

For **D. B. Corp Limited**

**Om Prakash Pandey**  
**Company Secretary & Compliance Officer**  
Membership No.: F7555

Encl.: As above

 **दैनिक भास्कर**  **दिव्य भास्कर**  **दिव्य मराठी**   
भारत का सबसे बड़ा समाचार पत्र समूह | 12 राज्य | 61 संस्करण | 3 भाषाएं



**Report by D. B. Corp Limited for violation/s related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 ('SEBI (PIT) 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	D. B. Corp Limited
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3.	<b>A. Details of Designated Person (DP)</b> i. Name of the DP ii. PAN of the DP iii. Designation of DP iv. Functional Role of DP v. Whether DP is Promoter or belongs to Promoter Group <b>B. If Reporting is for immediate relative of DP</b> i. Name of the immediate relative of DP ii. PAN of the immediate relative of DP <b>C. Details of transaction(s)</b> i. Name of the scrip ii. No of shares traded and value (Rs.) (Date- wise) <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 (Prohibition of Insider Trading) Regulations, 2015 ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Mr. Nishit Jain ACCPJ5768J Chief Operating Officer Ad Sales No Not Applicable Not Applicable D. B. CORP LIMITED BSE: 533151 NSE - DBCORP As per Annexure I NIL Not Applicable
4.	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015	Mr. Nishit Jain has sold 3500 equity shares of the Company over a calendar quarter without completing Pre - Clearance formalities.  Further, Mr. Nishit Jain failed to submit necessary disclosures as per the SEBI (PIT) Regulations,





# DB Corp Ltd

		<p>2015 and Code of Conduct of the Company, with respect to sale of equity shares, within the statutory timelines.</p> <p>Mr. Nishit Jain was not holding any Unpublished Price Sensitive Information (“UPSI”).</p>
5.	Action taken by Listed Company/ Intermediary/ Fiduciary	<p>The Company has taken following actions:</p> <ol style="list-style-type: none"> <li>Sought explanation from Mr. Nishit Jain in writing for committing the aforesaid violation; and</li> <li>Issued a strict warning letter to Mr. Nishit Jain to strictly adhere as per the statutory requirements, being the first instance of violation.</li> </ol>
6.	Reasons recorded in writing for taking action stated above	<p>Following points have been considered while taking action in terms of the Company’s Code of Conduct:</p> <ol style="list-style-type: none"> <li>Mr. Nishit Jain was not in possession of any Unpublished Price Sensitive Information (“UPSI”).</li> <li>As per the explanation received from Mr. Jain, he was under impression that he is required to take pre-clearance for the trade if the value exceeds Rs. 15,00,000/- in a calendar quarter. Hence, he missed out on seeking pre-clearance for the trade.</li> </ol>



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		Such violation was first instance and there was no history of earlier violation on the part of Mr. Jain.																						
7.	Details of the previous instances of violations, if any, since last financial year	No previous instance since last financial year.																						
8.	If any amount collected for Code of Conduct violation(s) Mode of transfer to SEBI - IPEF (Online/Demand Draft)	N.A.																						
	Details of transfer/payment: In case of Online: Not Applicable <table border="1" data-bbox="244 618 1254 913"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td></td> </tr> <tr> <td>Bank Name, Branch and Account number</td> <td></td> </tr> <tr> <td>UTR/Transaction Reference Number</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table> In case of Demand Draft (DD): Not Applicable <table border="1" data-bbox="244 985 1254 1171"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td>Not Applicable</td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD amount (in Rs.)</td> <td></td> </tr> </tbody> </table>		Particulars	Details	Name of the transferor		Bank Name, Branch and Account number		UTR/Transaction Reference Number		Transaction date		Transaction Amount (in Rs.)		Particulars	Details	Bank Name and branch	Not Applicable	DD Number		DD date		DD amount (in Rs.)	
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9.	Any other relevant information: Not Applicable																							

## Annexure I

Sr. No.	Date of Sale	No. of Securities	Rate per Shares	Trade Value (Incl all charges)
1	July 19, 2024	500	357.00	1,78,500.00
	September 23, 2024	3000	337.50	10,12,500.00
			<b>TOTAL</b>	<b>11,91,000.00/-</b>





  
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