



Corporate Office: 1401-1411, 14th Floor, Logix City Center,
Sector-32, Noida-201301 (U.P.)
Tel.: 0120- 6013232

30th November, 2022

BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Fort, <u>Mumbai – 400 001</u> Scrip Code: 519588	National Stock Exchange of India Ltd. (NSE) Exchange Plaza, Bandra Kurla Complex, Bandra (E), <u>Mumbai – 400 051</u> Symbol: DFMFOODS
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Dear Sir/Madam,

Sub.: Reporting of non-compliance by immediate relative of the Designated Person of DFM Foods Limited Code of Conduct to Regulate Monitor and Report Trading by Designated Persons as required by SEBI (Prohibition of Insider Trading) Regulations, 2015

This is in reference to the Company's Code of Conduct to Regulate Monitor and Report Trading by Designated Persons read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find attached herewith a Report in the format prescribed by SEBI Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 on non-compliance by the immediate relative of the Designated Person of DFM Foods Limited Code of Conduct to Regulate Monitor and Report Trading by Designated Person as required by SEBI (Prohibition of Insider Trading) Regulations, 2015.

You are requested to take note of the same.

Thanking you.

Yours faithfully,
For DFM Foods Limited

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by RAJU SINGH
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(R.S. Tomer)
Company Secretary

Report by DFM Foods Limited for violation related to the Code of Conduct to Regulate Monitor and Report Trading by Designated Person under SEBI (Prohibition of Insider Trading) Regulations, 2015

S. No.	Particulars	Details			
1.	Name of the Listed Company/ Intermediary/ Fiduciary	DFM Foods Limited			
2.	Reporting in capacity of: Listed Company Intermediary Fiduciary	Listed Company			
3.	A. Details of Designated Person (DP)				
	i. Name of the DP	Mr. Rajat Jain			
	ii. PAN of the DP	AEHPJ3826N			
	iii. Designation of DP	IT Head			
	iv. Functional Role of DP	IT Department			
	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	Mrs. Saloni Jain			
	ii. PAN of the immediate relative of DP	AEMPJ0202K			
	C. Details of transaction(s)				
	i. Name of the scrip	Equity Share of DFM Foods Limited BSE: 519588 NSE: DFMFOODS			
	ii. Number of shares traded and value (Rs.) (Date- wise)	Sell:			
		Date	No. of Shares	Price per share (In Rs.)	Total (In Rs.)
		26.09.2022	1,486	364	5,40,904
		28.09.2022	2,556	374	9,55,944
Total		4,042	-	14,96,848	
Buy:					
Date		No. of Shares	Price per share (In Rs.)	Total (In Rs.)	
28.09.2022		100	373	37,300	
Total		100	-	37,300	

D. In case value of trade(s) is more than Rs. 10 lacs in a calendar quarter		
	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	Intimation/ Recording of trades in Form C was not given by Mr. Rajat Jain (Designated Person) within 2 trading days of execution of trades. Form C was submitted by Mr. Rajat Jain later on 29 th November, 2022 and was immediately recorded by the Company.
	Date of intimation of trade(s) by Company to Stock Exchange under regulation 7 of SEBI (Prohibition of Insider Trading), Regulations 2015	Submission of Form C by Mr. Rajat Jain was done on 29 th November, 2022 and recorded by the Company in its records. The Company has done the requisite filings with exchanges on 30 th November, 2022.
4.	Details of violations observed under Code of Conduct	Mr. Rajat Jain through its immediate relative Mrs. Saloni Jain in a series of transactions sold 4,042 equity shares of the Company between 26th September, 2022 and 28th September, 2022. Also, purchased 100 equity shares on 28th September, 2022 in violation of contra trade. The aforesaid trades were executed during trading window open period. However, the trades were not recorded by the Designated Person in Structured Digital Database maintained by the Company and no intimation was given to the Company in prescribed Form C. The trading limit of Rs. 10 Lakh has been breached in the previous quarter. Contra Trade, i.e., buying of 100 equity shares within a period of 6 months of the previous sell transaction as per Clause 3.2.2 (vi) of DFM Code of Conduct to regulate monitor and Report Trading by Designated Persons and as per Clause 10 of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015.

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5.	Action taken by Listed Company	The Company sought clarification from Mr. Rajat Jain (Designated Person) on the violations and the same was responded by Mr. Rajat Jain stating that the aforesaid trades were executed by his wife inadvertently. A warning letter has been issued to Mr. Rajat Jain by the Management of the Company, to be more cautious in future and to consult the Compliance Officer before initiating any transaction. Mr. Rajat Jain tendered sincere apologies in writing.
6.	Reasons recorded in writing for taking action stated above	This was the first violation on the part of Mr. Rajat Jain under the SEBI PIT Regulation and Code of Conduct of the Company. Non-disclosure of the transactions and contra trade were inadvertent. The matter was reported to the Audit Committee. The following disciplinary action was taken as under: Levied a monetary penalty of Rs. 37,300/- which is equivalent to buying price of 100 equity shares @ Rs. 373 per share, to be deposited in SEBI-IPEF account.
7.	Details of the previous instances of violations, if any, since last financial year	None
8.	If any amount collected for Code of Conduct violation(s)	Yes
	i. Mode of transfer to SEBI – IPEF	Online
	ii. Details of transfer/ payment made On-line	As mentioned below.
	In case of Online:	
	Particulars	Details
	Name of the transferor	SALONI JAIN
	Bank Name, branch and Account number	ICICI Bank, Mumbai - Account No: XXXX01XX6280
	UTR/Transaction reference Number	0546961671



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	Transaction date	30.11.2022
	Transaction Amount (in Rs.)	Rs. 37,300/-
9.	Any other relevant information	Nil

Date: 30.11.2022

Place: Noida (UP)

Yours faithfully

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RAJU SINGH
TOMER
Date: 2022.11.30
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R.S. Tomer

Company Secretary & Compliance Officer

PAN: ADAPT6396H

Email ID: raju.tomer@dfmfoods.com