

May 27, 2021

BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001 Company Code No.: 543268	National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051 Company Symbol: DRCSYSTEMS
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Dear Sir/Madam,

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

Ref.: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020


With reference to the above, please find enclosed herewith the report of violation relating to code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the prescribed form as Annexure -A.

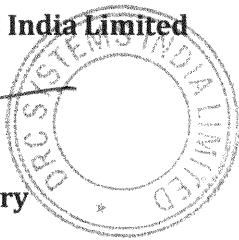
We would like to submit that the reported deviation is not material in relation to the total paid up Equity Share Capital of the Company.

Kindly take the same on your records, please.

Thanking you,

For, **DRC Systems India Limited**

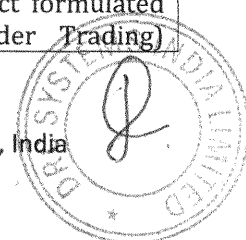

Jainam Shah
Company Secretary



Encl.: As above

Report by DRC Systems India 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	DRC Systems India 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.	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Ajay Patel
	ii. PAN of the DP	AILTP8947L
	iii. Designation of DP	Promoter
	iv. Functional Role of DP	The DP does not have any functional role in the Company
	v. Whether DP is Promoter or belongs to Promoter Group	Yes
	B. If Reporting is for immediate relative of DP: Not Applicable	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	C. Details of transaction(s)	
	i. Name of the scrip	DRC Systems India Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	08 (Eight) Equity Shares were purchased for a total consideration of ₹ 2,000/- on April 22, 2021
	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	Not Applicable as the traded value is less than Rs.10 lacs in the calendar quarter
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable as the traded value is less than Rs.10 lacs in the calendar quarter
4.	Details of violations observed under Code of Conduct	Mr. Ajay Patel had acquired 08 Equity Shares of the Company in the open market on the stock exchanges on April 22, 2021, when the trading window of the Company was closed for trading by designated persons and had not made any application to the Company to obtain pre-clearance from the Compliance Officer of the Company for trading in the Equity Shares of the Company in the open market.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The matter was reported to the Audit Committee which confirmed the violation of Code of Conduct formulated pursuant to SEBI (Prohibition of Insider Trading)



		<p>Regulations, 2015 by Mr. Ajay Patel and issued a Warning Letter condemning the act of violation and asking the promoter to be diligent in executing the future transaction(s) in consonance with the time-lines and procedure(s) as provided under the SEBI Regulations and also imposed a monetary penalty of ₹ 7,000/- (Rupees Seven Thousand only) inclusive of total consideration of Equity Shares purchased which will be remitted to the Investor Protection and Education Fund of SEBI as and when the same is received from the Promoter.</p> <p>He has been further advised that in case of any subsequent violation stricter action(s) would be taken by the Company.</p>												
6.	Reasons recorded in writing for taking action stated above	<p>The Designated Person informed that he has traded inadvertently due to oversight / unawareness with regard to the Closure period and Insider Trading Regulations.</p> <p>Further, considering the facts, Mr. Ajay Patel was not in possession of any unpublished price sensitive information and that the default was not repetitive in nature and that the shares purchased represented a miniscule portion of the total share capital of the Company,</p>												
7.	Details of the previous instances of violations, if any, since last financial year	Nil												
8.	If any amount collected for Code of Conduct violation(s)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online												
	ii. Details of transfer/payment													
	In case Online:													
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>DRC Systems India Limited</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>Bank Name: HDFC Bank Ltd. Branch: Vastrapur Branch Account No.: 00692320009882</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>N144211511271417</td> </tr> <tr> <td>Transaction date</td> <td>May 24, 2021</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>Rs. 7,000/-</td> </tr> </tbody> </table>		Particulars	Details	Name of the transferor	DRC Systems India Limited	Bank Name, branch and Account number	Bank Name: HDFC Bank Ltd. Branch: Vastrapur Branch Account No.: 00692320009882	UTR/Transaction reference Number	N144211511271417	Transaction date	May 24, 2021	Transaction Amount (in Rs.)	Rs. 7,000/-
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UTR/Transaction reference Number	N144211511271417													
Transaction date	May 24, 2021													
Transaction Amount (in Rs.)	Rs. 7,000/-													
9.	Any other relevant information													

Yours faithfully,

Date: May 27, 2021

Place: Gandhinagar

For, DRC Systems India Limited


Jainam Shah
Company Secretary & Compliance Officer
PAN: EJOPS5195F
Email: jainam.shah@drcsystems.com



DRC SYSTEMS INDIA LIMITED

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