



REF : GAEL\STOCK35\2023\45

Date : 10<sup>th</sup> August, 2023

**BY E-FILING**

**BSE Limited**

Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai - 400 001

**The National Stock Exchange of India Limited**

Exchange Plaza, Plot No. C/1,  
G Block, Bandra Kurla Complex,  
Bandra (E), Mumbai - 400 051

**Scrip Code: 524226**

**Symbol: GAEL**

Dear Sir / Madam,

**Sub.:- Reporting the violation under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct**

With reference to the SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23<sup>rd</sup> July, 2020, please find attached herewith report on violation under SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct of the Company by Designated Person in Annexure-A.

You are requested to take the same on your record.

Thanking you.

Yours faithfully,

**FOR, GUJARAT AMBUJA EXPORTS LIMITED**

**KALPESH DAVE**  
**COMPANY SECRETARY**



Encl.: As above



ANNEXURE A

SR. NO.	PARTICULARS	DETAILS
1.	Name of the listed company/ <del>Intermediary/Fiduciary</del>	Gujarat Ambuja Exports Limited
2.	Please tick appropriate checkbox Reporting in capacity of : <input type="radio"/> Listed Company <input type="radio"/> Intermediary <input type="radio"/> Fiduciary	Listed Company
3.	<b>A. Details of Designated Person (DP)</b>	
	i. Name of DP	Mr. Anil Joshi
	ii. PAN of DP	ANRPJ2832R
	iii. Designation of DP	Manager
	iv. Functional role of DP	HR Department, Akola unit of the Company
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If reporting is for the immediate relative of DP</b>	
	i. Name of immediate relative of DP	N.A.
	ii. PAN of immediate relative of DP	N.A.
	<b>C. Details of Transaction(s)</b>	
	i. Name of the scrip	BSE Scrip Code: 524226 NSE Scrip Code: GAEL
	ii. No of shares traded and value (Rs.) (Date- wise)	520 Shares of Rs. 1,33,807 traded on 25 <sup>th</sup> July, 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	N.A.
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	N.A.
4.	Details of violations observed under Code of Conduct	Traded in shares of the Company during window closure period of first quarter i.e. from 01 <sup>st</sup> July, 2023 till 48 hours after the declaration of financial results
5.	Action taken by Listed company/ <del>Intermediary/ Fiduciary</del>	The Audit Committee of the Company have decided to impose penalty of Rs. 4,688/- from the designated person



6.	Reasons recorded in writing for taking action stated above	Violated Clause 9.1 of the Code of Conduct for Prohibition of Insider Trading of the Company. (Trading Window and Window Closure)												
7.	Details of the previous instances of violations, if any, since last financial year	N.A.												
8.	If any amount collected for Code of Conduct violation(s)	₹ 4,688/-												
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online transfer												
	ii. Details of transfer/payment  In case of Online:  In case of Demand Draft (DD): NA	Payment through Online transfer  Payment details: <table border="1"><thead><tr><th>Particulars</th><th>Details</th></tr></thead><tbody><tr><td>Name of the transferor</td><td>Mr. Anil Joshi</td></tr><tr><td>Bank Name, branch and Account Number</td><td>HDFC Bank Ltd, Sethi Heights, Opp. Zhilla Parishad, Akola (M.S). Bank Account No.02211050026107</td></tr><tr><td>UTR/Transaction reference Number</td><td>Ref. No. N219232582753374</td></tr><tr><td>Transaction Date</td><td>07/08/2023</td></tr><tr><td>Transaction Amount</td><td>₹ 4,688</td></tr></tbody></table>	Particulars	Details	Name of the transferor	Mr. Anil Joshi	Bank Name, branch and Account Number	HDFC Bank Ltd, Sethi Heights, Opp. Zhilla Parishad, Akola (M.S). Bank Account No.02211050026107	UTR/Transaction reference Number	Ref. No. N219232582753374	Transaction Date	07/08/2023	Transaction Amount	₹ 4,688
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UTR/Transaction reference Number	Ref. No. N219232582753374													
Transaction Date	07/08/2023													
Transaction Amount	₹ 4,688													
9.	Any other relevant information	N.A.												

Yours faithfully,



Date: 10.08.2023  
Place: Ahmedabad  
Email Id : [cs@ambujagroup.com](mailto:cs@ambujagroup.com)

Kalpesh Dave  
Company Secretary and Compliance Officer  
PAN: ASQPB2493J