

October 10, 2026

The Compliance Manager
BSE Limited
Corporate Relationship Dept.,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai 400001.

Scrip Code: **500655**

The Manager, Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Plot No. C/1, G Block,
Bandra-Kurla Complex,
Bandra (East), Mumbai 400 051.

Trading Symbol: **GRWRHITECH**

Dear Sir/ Ma'am,

Sub: Reporting under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Pursuant to the provision of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations"), the Company's Code of Conduct, and SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, as amended from time to time, we hereby enclose Annexure A to this letter regarding violation of the Company's Code of Conduct by a Designated person.

Thanking you,

Yours faithfully,

For Garware Hi-Tech Films Limited

AWANEESH KUMAR SRIVASTAVA
Digitally signed by
AWANEESH KUMAR
SRIVASTAVA
Date: 2026.10.10
13:57:31 +05'30'

Awaneesh Srivastava
Company Secretary
FCS 8513

Encl.: As stated above

Annexure A

Report by Garware Hi-Tech Films 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

Sr. No.	Particulars	Details
1.	Name of the listed company/ Intermediary/ Fiduciary	Garware Hi-Tech Films Limited
2.	Please tick appropriate checkbox Reporting in capacity of : ☒ Listed Company ☐ Intermediary ☐ Fiduciary	Listed on BSE & NSE
3.	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Ashok Narayan Dane
	ii. PAN of the DP	ABGPD0802Q
	iii. Designation of DP	General Manager
	iv. Functional Role of DP	Production
	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	-
	ii. PAN of the immediate relative of DP	-
	C. Details of transaction(s)	
	i. Name of the scrip	NSE - GRWRHITECH BSE - 500655

	ii. No of shares traded and value (Rs.) (Date-wise)	#During the period of December 5, 2025, to May 15, 2026, 16 equity shares were bought for ₹ 54704.10/-* and 26 equity shares were sold for ₹1,14,796.85/- * # Violation of the Code of Conduct i.e. Contra Trade executed by the Designated Person for 16 shares during the said period. (*We have taken the weekly closing price for calculation of value of transactions)
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	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	Violation of the Code of Conduct, Contra Trade executed by the Designated Person during the six months period post the previous buy.
5.	Action taken by Listed Company / Intermediary/ Fiduciary	The matter was placed before the Audit Committee in its meeting held on August 06, 2026, the committee imposed a penalty of Rs. 5,000/-. As stated, an amount of Rs 5,000/- has been deposited to SEBI – IPEF account by Mr. Ashok Narayan Dane.
6.	Reasons recorded in writing for taking action stated above	The Designated Person is an employee of the Company. He confirmed in writing that the default was inadvertent without any deliberate intention to contravene the provisions of the Company' Code of Conduct or the applicable SEBI (PIT) Regulations, 2015, and trade was not based on access to or use of any Unpublished Price Sensitive Information

		(UPSI). However, these actions constitute a violation of the provisions of the Company's Code of Conduct and the SEBI (Prohibition of Inside Trading) Regulations, 2015. Considering all relevant aspects, including the submission, the Audit Committee of the Company has imposed an aggregate penalty of Rs. 5,000/- and has warned him not to repeat the same in the future.												
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):													
	i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft)	Online												
	ii. Details of transfer/payment in case of Online: Yes													
	<table><tr><th>Particulars</th><th>Details</th></tr><tr><td>Name of the Transferor</td><td>Mr. Ashok Narayan Dane</td></tr><tr><td>Bank Name, Branch and Account Number</td><td>-</td></tr><tr><td>UTR/Transaction reference Number</td><td>260821283031107</td></tr><tr><td>Transaction Date</td><td>21/08/2026</td></tr><tr><td>Transaction Amount (in Rs.)</td><td>Rs. 5,000/-</td></tr></table>	Particulars	Details	Name of the Transferor	Mr. Ashok Narayan Dane	Bank Name, Branch and Account Number	-	UTR/Transaction reference Number	260821283031107	Transaction Date	21/08/2026	Transaction Amount (in Rs.)	Rs. 5,000/-	
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	In Case of Demand Draft (DD) :													
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DD Date														
DD Amount (in Rs.)														
9.	Any other relevant information	Nil												