

June 28, 2025

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**

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

This is to inform you that in terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("the SEBI Regulations"), code of conduct of the Company and SEBI circular no. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/039 dated March 23, 2023, as amended from time to time, we hereby submit the details in Annexure-A of this letter with regard to the violation of Code of Conduct by Relatives/Immediate Relatives of the Connected person.

Thanking you,

Yours faithfully,
For Garware Hi-Tech Films Limited

Awaneesh Srivastava
Company Secretary
FCS 8513

Encl: as stated above

GARWARE HI-TECH FILMS LIMITED

CORPORATE OFFICE :
GARWARE HOUSE, 50-A, SWAMI NITYANAND MARG
VILE PARLE (EAST), MUMBAI – 400 057.
TEL: 0091-22-6698 8000 (15 LINES)
WEBSITE: www.garwarehitechfilms.com
CIN: L10889MH1957PLC010889

REGD. OFFICE: NAIGAON, P.O. WALUJ,
CHHATRAPATI SAMBHAJI NAGAR – 431 133 (INDIA)

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 : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed on BSE & NSE
3.	A. Details of Designated Person (DP)	
	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. If Reporting is for immediate relative of DP / Connected Person (CP)	
	i. Name of the immediate relative of DP / CP	1. Ms. Preeyal Pramod Satam and 2. Mrs. Priya Pramod Satam (Immediate relatives of connected person- ex employee)
	ii. PAN of the immediate relative of DP / CP	1. Ms. Preeyal Pramod Satam - QKJPS6725R 2. Mrs. Priya Pramod Satam ANFPS4900H
	C. Details of transaction(s)	
	i. Name of the scrip	500655 and GRWRHITECH

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ii. No of shares traded and value (Rs.) (Date-wise)	Date	Name	Particulars	No. of shares	Consideration (Rs.)
	25-04-2025	Preeyal Pramod Satam	Purchase	25 nos of shares @ Rs. 3,317 per share	82,925
	02-05-2025	Preeyal Pramod Satam	Sale	25 nos of shares @ Rs. 3,162 per share	79,050
	25-04-2025	Priya Pramod Satam	Purchase	15 nos of shares @ Rs. 3,317 per share	49,755
Note:- The details has not been provided by Connected Person, however the Company has taken weekly closing prices for computation purpose.					
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	--				
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	<p>Violation of the Code of Conduct, Trade and Contra Trade executed during the closure of trading window by the immediate relatives of Mr. Pramod Satam - Connected Person (who was ceased from employment of the company with effect from 21st November, 2024).</p> <p>Immediate Relatives of Mr. Pramod Satam, 1. Ms. Preeyal Pramod Satam had executed</p>				

		trade and contra trade and 2. Mrs. Priya Pramod Satam had executed trade, during the closure of trading window.
5.	Action taken by Listed Company/ Intermediary/ Fiduciary	The matter was placed before the Audit Committee at its meeting held on 14 th May, 2025, the committee imposed a penalty of Rs. 25,000/- on each person along with the profit earned, if any. The penalty and profit (if any) be deposited to SEBI IPEF, the ex-employee has not deposited the penalty till date.
6.	Reasons recorded in writing for taking action stated above	<p>The notice for violation was issued to Mr. Pramod Satam on 08th May, 2025.</p> <p>The response/ reply was not received till the date of the Audit Committee meeting i.e 14th May, 2025</p> <p>The Audit Committee observed that:</p> <ol style="list-style-type: none"> i. Trade has been undertaken by the connected person or their immediate relatives during the closure of trading window. ii. Ignorance of law is no excuse. iii. Violation of law is violation irrespective of the amount. If a trade/contra trade be executed, inadvertently or otherwise, in violation of such a restriction irrespective of the materiality and any such practices on the part of individuals/ex-employee or their relatives be discouraged. <p>Considering the aforesaid points, the Audit Committee imposed the penalty.</p>
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): No	
	i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft)	-

ii. Details of transfer/payment in case of Online: - N.A.		
Particulars	Details	
Name of the Transferor	-	
Bank Name, Branch and Account Number	-	
UTR/Transaction reference Number	-	
Transaction Date	-	
Transaction Amount (in Rs.)	-	
In Case of Demand Draft (DD) :		
Particulars	Details	
Bank and Branch	N.A.	
DD Number		
DD Date		
DD Amount (in Rs.)		
9.	Any other relevant information	No information is received till the date of filing with respect to deposit of Penalty.