

Gujarat Sidhee Cement Limited

Corporate Office
N K Mehta International House, 2nd Floor,
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E sidhee-mum@mehtagroup.com
CIN : L26940GJ1973PLC002245

Ref: B/GSCL/SE/VRM/73/2021-22

March 17, 2022

Corporate Relationship Manager,
BSE Limited,
1st Floor, New Trading Ring, Rotunda Bldg,
P.J. Tower, Dalal Street,
Mumbai - 400001.
Stock Code No: 518029

National Stock Exchange of India Limited
Exchange Plaza,
Bandra Kurla Complex,
Bandra East)
Mumbai – 400051
Stock Symbol: GSCLCEMENT

Dear Sir, Madam,

Sub: Reporting Violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

This is to inform you that in terms of the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of the Company's code of conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015 by the Designated Person (DP) along with the action taken by the Company thereon is enclosed to this letter.

Kindly take this on record and acknowledge receipt.

Thanking you,
Yours faithfully

For **Gujarat Sidhee Cement Limited**



V. R. Mohnot
CFO & Company Secretary

Encl: as above



Regd. Office & Works
Sidheegram, Veraval 362 276
Gujarat, India

Annexure I

Report by (Name of the listed company/ Intermediary/Fiduciary) for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

For Intermediaries/ Fiduciaries: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Gujarat Sidhee Cement Limited
2	Please tick appropriate checkbox Reporting in capacity of : ☐ Listed Company ☐ Intermediary ☐ Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Nitin Gadia
	ii. PAN of the DP	AMAPG3022G
	iii. Designation of DP	Manager (Accounts)
	iv. Functional Role of DP	Accounting
	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	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	Gujarat Sidhee Cement Limited BSE CODE: 518029 NSE SYMBOL: GSCLCEMENT
	ii. No of shares traded and value (Rs.) (Date- wise)	As per Annexure

	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
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	Details of violations observed under Code of Conduct	Violation of sub-clause ii of Clause XVIII – Holding Period / Contra Trade. The Designated Person has purchased 3555 shares of GSCL on 28th of February 2022 and sold 250 shares on 28th of February 2022 and 3000 shares on 2nd March 2022.
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Managing Director and the Compliance Officer is empowered to take action as per the Gujarat Sidhee Cement Limited Insider Trading Code of Conduct. Accordingly, the Company has imposed penalty of Rs.20,000/- under Substantive Non-compliances under the Gujarat Sidhee Cement Limited Insider Trading Code of Conduct .
6	Reasons recorded in writing for taking action stated above	An opportunity was given to the Designated Person to explain his case. He provided in writing that he undertook the transaction due to misinterpretation of the law and sincerely apologized.
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 of Online:	
	Particulars	Details
	Name of the transferor	Gujarat Sidhee Cement Limited
	Bank Name, branch and Account number	HDFC Bank Limited, Industry House Branch, Churchgate, Mumbai 400 020 A/c No.05018180000078
	UTR/Transaction reference Number	N075221877241926
	Transaction date	16/03/2022
	Transaction Amount (in Rs.)	Rs.20,000/-
	In case of Demand Draft (DD):	
	Particulars	Details
	Bank Name and branch	-
	DD Number	-
	DD date	-
	DD amount (in Rs.)	-
9	Any other relevant information	

Thanking you,

Yours faithfully,

For Gujarat Sidhee Cement Limited



 V. R. Mohnot

CFO & Company Secretary

Date: 17.3.2022

Place: Mumbai

PAN: AAZPM0667J

Email ID: vrnmoht@mehtagroup.com