



Ref: SECT: STOC: 103-21

November 24, 2021

To
The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

To
The Manager,
Listing Department,
National Stock Exchange of India Limited
Exchange Plaza, C-1, G Block, Bandra-Kurla Complex,
Bandra (East), Mumbai - 400 051

Scrip Code: 519552

Scrip Code: HERITGFOOD

Sub: Reporting to Stock Exchanges regarding deviation related to Code of Conduct (CoC) under the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Ref: SEBI Circular No. SEBI/HO/ISD/CIR/P /2020/135 dated July 23, 2020

Dear Sir/Madam,

With respect to the above subject and reference, please find enclosed herewith the report by the Company for deviation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the prescribed form Annexure-A.

Kindly take the above information on record.

Thanks & Regards,

For HERITAGE FOODS LIMITED


UMAKANTA BARIK
Company Secretary & Compliance Officer
M. No: FCS-6317

Enc: a/a

About the Company:

Heritage Foods founded in the year 1992 is one of the fastest growing Private Sector Enterprises in India, with two business divisions viz., Dairy and Renewable Energy under its flagship company Heritage Foods Limited and Cattle feed business through its subsidiary, Heritage Nutrivet Limited (HNL). Presently Heritage's milk and milk products have market presence in Andhra Pradesh, Telangana, Karnataka, Kerala, Tamil Nadu, Maharashtra, Odisha, NCR Delhi, Haryana, Uttar Pradesh and Uttarakhand. It has total renewable energy generation capacity of 10.39 MW from both Solar and Wind for captive consumption of its dairy factories.



HERITAGE FOODS LIMITED

CIN : L15209TG1992PLC014332

AN ISO: 22000 CERTIFIED COMPANY

Regd. Off: # 6-3-541/C, Panjagutta, Hyderabad - 500 082. Telangana, INDIA. Tel.: +91-40-23391221, 23391222, Fax: 23326789, 23318090
Email: hfl@heritagefoods.in, Website : www.heritagefoods.in





Annexure A

Report by Heritage Foods Limited for violations/deviations 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	Heritage Foods 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	N P Ramakrishna
	ii. PAN of the DP	ADEPN3196M
	iii. Designation of DP	Persons Acting In Concert (Promoters Group)
	iv. Functional Role of DP	NA
	v. Whether DP is Promoter or belongs to Promoter Group	Promoter Group
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	Heritage Foods Limited - Equity Shares
	ii. No of shares traded and value (Rs.) (Date-wise)	Sold 4,129 equity shares on 01-10-2021 aggregating to Rs.0.19 Cr and sold 10,000 equity shares on 04-10-2021 aggregating to Rs.0.45 Crs
	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	05-10-2021 and 06-10-2021
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	06-10-2021 and 07-10-2021
4	Details of violations/deviations observed under Code of Conduct	14,129 equity shares sold during trading window closure period by the Designated Person.

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Sr. No.	Particulars	Details
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The Company has issued a caution notice to Mr. N P Ramakrishna stating that he should not engage in any kind of dealings in the Equity Shares of the Company.</p> <p>Further, he has also been advised to strictly comply with the Insider Trading Regulations and Code of Conduct of the Company and ensure that the same is not deviated by him in future.</p>
6	Reasons recorded in writing for taking action stated above	<p>The Designated Person does not involve any control over the day to day affairs or decision making of the Company which may result in influencing the price of shares of the Company and the shares sold by him was acquired more than two decades back and DP was not in possession of any unpublished price sensitive information of the Company. Considering the above factor the Board of Directors of the company decided to not to impose any penalty for this deviation and issue a caution notice not to repeat the same in future.</p> <p>The following aspects have inter-alia been considered before deciding the action taken against Designated Person (DP) for the aforesaid deviation:</p> <ul style="list-style-type: none"> • As submitted by DP, it was an inadvertent trade as he was not aware of the closure of trading window and that the timing of the sale was purely unintentional. • DP was not in possession of any unpublished price sensitive information of the Company. • It is a first time deviation
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)	NA
	ii. Details of transfer/payment In case of Online: In case of Demand Draft (DD):	
9	Any other relevant information	



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