THE HI-TECH GEARS LTD.

CIN - L29130HR1986PLC081555

Corporate Office : Millennium Plaza, Tower-B, Sushant Lok-1, Sector-27, Gurugram - 122009, Haryana, INDIA Tel. : +91-(124) 4715100

May 20, 2022

The Manager,
Listing Department,
National Stock Exchange of India Limited,
"Exchange Plaza", C-1, Block – G
Bandra – Kurla Complex,
Bandra (E), Mumbai – 400051,
Symbol: HITECHGEAR

The Manager,
Listing Department,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400001,
Scrip Code: 522073

Dear Sir/Ma'am,

Subject: -Reporting of Violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

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

We would like to inform that one of the Designated Person of The Hi-Tech Gears Limited ("Company"), had dealt in 100 equity shares of the Company during the period when trading window was closed.

In compliance with SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, a report on the violation and action taken by company is annexed as "Annexure - A".

Kindly take the above information on record.

Thanking you.

Yours faithfully,
For The Hi-Tech Gears Limited

Naveen Jain
Company Secretary
Membership No. – A15237

The Hi-Tech Gears Limited Gurugram

Encl: as above.

ANNEXURE-A

Report by (The Hi-Tech Gears Limited) for violationsrelated to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	The Hi-Tech Gears 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	Ajai Singh Shah
	ii. PAN of the DP	ACEPS0733N
	iii. Designation of DP	General Manager Maintenance
	iv. Functional Role of DP	Maintenance of Machines, Plants etc.
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP **No**	
	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	The Hi-Tech Gears Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	A)Purchased 100 shares @ 280.46 per share on January 21, 2022. B)Sold 100 shares @ 225.01 per share on April 22, 2022. C)Purchased 100 shares @ 226.78 per share on April 22, 2022.
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter	

The Hi-Tech Gears Limited Gurugram

Sr. No.	Particulars	Details
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Companyunder 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	NA
4	Details of violations observed under Code of Conduct	The Designated Person has transacted / dealt in shares of company during the period when trading window was closed.
5	Action taken by Listed company/ Intermediary/ Fiduciary	As per Annexure enclosed
6	Reasons recorded in writing for taking action stated above	As per Annexure enclosed
7	Details of the previous instances of violations, if any, since last financial year	No previous violation
8	If any amount collected for Code of Conduct violation(s)	Nil
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	N.A
	ii. Details of transfer/payment	

In case of Online

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 Name and branch	
DD Number	
DD date	
DD amount (in Rs)	

9	Any other relevant information	None

For The Hi-Tech Gears Limited

The Hi-Tech Gears Limited Gurugram

Naveen Jain
Company Secretary and Compliance Officer
PAN: AEVPJ456IN
Email ID: naveen.jain@thehitechgears.com
Address: 14th Floor, Towers –B, Millennium Plaza, Sushant Lok-I, Sector-27, Gurugram-120002, Haryana

ANNEXURE

Violation of Code of Conduct to Regulate, Monitor and Report Trading By Designated Persons and Their Immediate Relatives - hereinafter referred to as "Code"

Name of Designated Person (DP)

Mr. Ajai Singh Shah is working with company as General Manager Maintenance. He is responsible for maintenance of machines, plants etc. among other responsibilities at factory premises

Background

During the trading window closure period declared by the company, Mr. Ajay Shah had out of ignorance dealt in shares of the company as details mentioned below:-

Sr. No.	Date	Buy/Sell	Number of Share	Buying/Selling Price Per Share	Total Amount
1	21-01-2022	Buy	100	280.46	28,046/-
2	22-04-2022	Sell	100	225.01	22,501/-
3	22-04-2022	Buy	100	226.78	22,678/-

Action Taken

Company issued a Show Cause Notice to the DP seeking his explanation on violation noticed by the Company. In response to the SCN, the DP pleaded guilty and stated that he traded in the shares of Company during the trading window closure period inadvertently by ignorance & misunderstanding. Further he has stated that he is a technical person and did not have any access to UPSI and did not make any profit on such trading.

We further had taken action in terms of clause code and he has been barred from dealing in the securities of the Company for a period of six months w.e.f. 18th May, 2022.

In the next Audit Committee and Board of Directors' meeting, this matter related to violation of code by DP shall be placed for their consideration in terms of code.

We shall submit an updated report post consideration by Audit/Board.

For The Hi-Tech Gears Limited





Naveen Jain
Company Secretary and Compliance Officer
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Email ID: naveen.jain@thehitechgears.com
Address: 14th Floor. Towers –B, Millennium Plaza,
Sushant Lok-I, Sector-27, Gurugram-120002, Haryana