



Marine Electricals (India) Limited

B-1, Udyog Sadan-3, MIDC, Andheri (E), Mumbai-93, INDIA, Tel.: 91-22-40334300 Fax: 91-22-28364045 E-mail : info@marineelectricals.com
Website : www.marineelectricals.com CIN : L31907MH2007PLC176443 (Formerly known as Marine Electricals (I) Pvt. Ltd.)



Ref: MEIL/SEC/2023-24/70

Date: 11th November, 2023

To,
The National Stock Exchange of India Limited.

Exchange Plaza, 5th Floor, Plot No. C/1
G Block, Bandra- Kurla Complex,
Bandra (East), Mumbai – 400051

Symbol: MARINE

Dear Sir / Madam,

Sub: Reporting of violation 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”), and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of the Code of Conduct by the Designated Person along with the action taken by the Company thereon is enclosed as “**Annexure A**” to this letter.

You are requested to take the same on your record.

Yours faithfully,

For Marine Electricals (India) Limited

Mitali Ambre
Company Secretary and Compliance officer
ACS: 60296

Encl: As above



Annexure A

Report by Marine Electricals (India) Limited for violations related to Code of Conduct under SEBI (Prohibition of Insidertrading) Regulations, 2015

Sr. No.	Particulars	Details																																																
1.	Name of the listed Company/ Intermediary/Fiduciary	Marine Electricals (India) 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 Designated Person (DP)	Mr. Rajeev Malhotra																																																
	ii. PAN of the DP	AHHPM2333G																																																
	iii. Designation of DP	COO- Chief Operating Officer																																																
	iv. Functional Role of DP	Chief Operating Officer – Marine Navy Department																																																
	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	NA																																																
	ii. PAN of the immediate relative of DP	NA																																																
	C. Details of transaction(s)																																																	
	i. Name of the scrip	Marine Electricals (India) Limited NSE Symbol: MARINE																																																
	ii. No of shares traded and value (Rs.) (Date- wise)	<table border="1"> <thead> <tr> <th>Date</th><th>Transaction</th><th>No of Shares</th><th>Value (Rs)</th></tr> </thead> <tbody> <tr><td>13.04.2023</td><td>BUY</td><td>3500</td><td>143725</td></tr> <tr><td>16.05.2023</td><td>BUY</td><td>1000</td><td>44000</td></tr> <tr><td>01.06.2023</td><td>SOLD</td><td>5500</td><td>265385</td></tr> <tr><td>16.06.2023</td><td>BUY</td><td>2000</td><td>101100</td></tr> <tr><td>30.06.2023</td><td>BUY</td><td>5000</td><td>246100</td></tr> <tr><td>14-08-2023</td><td>SOLD</td><td>5000</td><td>311323.8</td></tr> <tr><td>06-09-2023</td><td>BUY</td><td>1635</td><td>102303</td></tr> <tr><td>15-09-2023</td><td>BUY</td><td>1000</td><td>61100</td></tr> <tr><td>27-09-2023</td><td>BUY</td><td>1000</td><td>59100</td></tr> <tr><td>06-10-2023</td><td>BUY</td><td>1000</td><td>58800</td></tr> <tr><td>09-10-2023</td><td>BUY</td><td>2000</td><td>114200</td></tr> </tbody> </table>	Date	Transaction	No of Shares	Value (Rs)	13.04.2023	BUY	3500	143725	16.05.2023	BUY	1000	44000	01.06.2023	SOLD	5500	265385	16.06.2023	BUY	2000	101100	30.06.2023	BUY	5000	246100	14-08-2023	SOLD	5000	311323.8	06-09-2023	BUY	1635	102303	15-09-2023	BUY	1000	61100	27-09-2023	BUY	1000	59100	06-10-2023	BUY	1000	58800	09-10-2023	BUY	2000	114200
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	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.	N.A.
	ii. Date of intimation of trade(s) by Company to Stock Exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015.	N.A.
4.	Details of violations observed under Code of Conduct	Execution of Contra Trades in shares of the Company by the Dp and also execute trade during the closure of trading window.
5.	Action taken by Listed Company/ Intermediary/ Fiduciary	The Company had issued a warning letter and instructed to remit 100% of the profit made to SEBI for credit to the Investor Protection and Education Fund. Cautioned him not to repeat any violation in future under the Code.
6.	Reasons recorded in writing for taking action stated above	Violation of Insider Trading Code of Company execution of contra trade and execute trade during the closure of trading window.
7.	Details of previous instances of violations, if any, since last financial year	First-time identification of violation of the Insider Trading Code and SEBI (PIT) regulations, 2015.
8.	If any amount collected for Code of Conduct violation(s):	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft) ii. Details of transfer/payment in case of Online:	Online Payment on 10.11.2023 Rs 64,250/- (Transaction Ref No. 331423702566) Name of the Transferor: Rajeev Malhotra Bank Name: HDFC Bank
	iii. In case of Demand Draft (DD):	
9.	Any other relevant information	Nil