

July 5, 2021

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400001
Company Code: 526235

To,
National Stock Exchange of India Ltd.
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex, Bandra (E),
Mumbai - 400051
Company Code: MERCATOR

Dear Sir/Madam,

Sub.: Reporting of Violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

In terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015, we are submitting herewith the report and action taken by Company in Annexure A for violation of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 read with SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

This is for your information and records.

Thanking You,

Yours faithfully,
For Mercator Limited

RAJENDRA
KUMAR KOTHARI

Digitally signed by RAJENDRA KUMAR KOTHARI
DN: cn=RA, o=Personal
serialNumber=16742148da695a4982792478a434d4201087
3, c=MAHARASHTRA,
st=MAHARASHTRA,
emailAddress=rajendra.kothari@mercator.in,
1250793cc5c29c4d499cc940, cn=RAJENDRA KUMAR
KOTHARI
Date: 2021.07.05 16:16:38 +0530

Rajendra Kothari
Chief Financial Officer

Encl.: A/a

**Report by Mercator Limited for violations related to Code of Conduct under SEBI
(Prohibition of Insider Trading) Regulations, 2015**

Sr. No.	Particulars	Details
1	Name of the listed company/ ~~Intermediary/Fiduciary~~	Mercator Limited
2	Please tick appropriate checkbox Reporting in capacity of: ☒ Listed Company ☐ Intermediary ☐ Fiduciary	
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mrs. Archana Mittal
	ii. PAN of the DP	ADGPM7171D
	iii. Designation of DP	Promoter
	iv. Functional Role of DP	-
	v. Whether DP is Promoter or belongs to Promoter Group	Yes. Promoter
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	N.A.
	ii. PAN of the immediate relative of DP	
	C. Details of transaction(s)	
	i. Name of the scrip	Equity shares of Mercator Limited
	ii. No of shares traded and value (Rs.)(Date- wise)	45, 47,431 shares at an average price of Rs. 2 per share
	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	02.07.2021
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	02.07.2021
4	Details of violations observed under Code of Conduct	Mrs. Archana Mittal has sold 45,47,431 Equity Shares of the Company on 30 th June, 2021 i.e. during the period, when the Trading Window was closed for Designated Persons and their immediate relatives of the Company.
5	Action taken by Listed company/ ~~Intermediary/Fiduciary~~	Warning Letter has been issued to Designated Person. A penalty of Rs. 20,000/- has also been levied. A reply from the Designated Person is

		awaited and the Company shall simultaneously inform the Exchanges about the transfer of penalty.
6	Reasons recorded in writing for taking action stated above	A similar instance had occurred in May’2021 and hence, the Resolution Professional has decided to levy penalty on the violation.
7	Details of the previous instances of violations, if any, since last financial year	Yes. Mrs. Archana Mittal had traded 12,00,890 equity shares on 5 th May, 2021 during window closure period.
8	If any amount collected for Code of Conduct violation(s): The amount of penalty shall be transferred upon receipt of the same and shall be intimated to the Exchanges simultaneously.	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	
	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	No

For Mercator Limited
**RAJENDRA
KUMAR KOTHARI**

Digitally signed by RAJENDRA KUMAR KOTHARI
 DN: cn=RA, o=Personal,
 pseudonym=f167421dabbe95a4986792478a434d
 a501b972c443668bdcfa13af929a18,
 postalCode=400104, st=MAHARASHTRA,
 serialNumber=93bf16a165301e2c2378b3779edc0
 762c7fba1250703c03c29c0d5d9acc94b,
 cn=RAJENDRA KUMAR KOTHARI
 Date: 2021.07.05 17:08:30 +05'30'

Name and Signature of Chief Financial Officer: Rajendra Kothari
PAN: ATEPK9708L
Email ID: rajendra.kothari@mercator.co.in
Date: 05/07/2021
Place: Mumbai
MERCATOR LIMITED
 (CIN : L63090MH1983PLC031418)

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