

11th June, 2021

To,

Corporate Service Dept. Bombay Stock Exchange Limited Jeejeebhoy Towers Dalal Street, Mumbai – 400 001 Script code: 532722	The Listing Department, National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai – 400051. Script code: NITCO
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Dear Sir,

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

Ref.: SEBI Circular No. SEBI/HO/ISD/CIR/P/2019/82 dated July 19, 2019

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

The Compliance officer brought the violation to the notice of Audit Committee of the Company. Audit Committee considered that since the violation was committed inadvertently with no intention of making profits the committee authorised the compliance officer to giving warning to such designated person to not indulge in contra trading in future. Since the quantum of contra trade done was only of 1 share no penalty was levied on the designated person.

This is for your information and record.

Yours faithfully,

For **NITCO Limited**



Puneet Motwani

Company Secretary & Compliance Officer





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Annexure -A

Reporting of Insider Trading violation under Regulation 9(1) of SEBI (PIT) Regulations, 2015

Sr. No.	Particulars	Details
1	Name of the listed entity	Nitco Limited
2	Please tick the appropriate box Reporting in the capacity of : ☒ Listed entity ☐ Intermediary ☐ Fiduciary	
3	Name of the Designated person	Mr. Pradeep Brahmkar
4	PAN of DP	ALHPB3494M
5	Designation of DP	Sr. Executive- Accounts
6	Functional role	Accounts
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details:	
	a) Name of the scrip	NSE- NITCO BSE- 532722
	b) No. of shares traded(which includes pledge) and value in Rs	Sold 1 Equity Share amounting to Rs. 25/- on 3 rd December, 2020
9	In case value of trade is more than Rs. 10 lacs in a calendar quarter- a) Date of intimation of trade(S) by concerned DP/Director/promoter/promoter group to Company under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015 b) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	NA
10	Details of violations observed under SEBI (PIT) Regulations, 2015	1. Had indulged in contra trade within a period of 6 months. 2. Sold 1 share of the company on 3 rd December, 2020 at Rs. 25/- which was bought on 4 th September, 2020 at Rs. 18.80/-
11	Action taken by the listed entity	Since the quantum of share was only 1 the Audit Committee authorised the compliance officer to issue warning to the

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Tel.: 91-22-67302500 | 67521555, Fax: 91-22-25786484. CIN: L26920MH1966PLC016547.

Email: investorgrievances@nitco.in, Website: www.nitco.in



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		designated person to refrain from doing any such contra trades in future.
12	Reason observed in writing for taking action as stated above	An explanation was sought from Mr. Pradeep Brahmanekar on doing contra trade. He admitted the violation of Insider Trading and the same was not intentional but due to ignorance.
13	Details of previous instances of violations, if any	NIL
14	Any other relevant information	None



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