



NITIN SPINNERS LTD.



NITIN

Report by Nitin Spinners Limited for violations 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}

S.No.	Particulars	Details
1	Name of the Listed Company/Intermediary/Fiduciary	Nitin Spinners Limited
2	Please tick appropriate checkbox Reporting in capacity of : <ul style="list-style-type: none"> Listed Company Intermediary Fiduciary 	Listed Company
3	A details of Designated Person (DP) <ul style="list-style-type: none"> i) Name of the DP ii) PAN of the DP iii) Designation of DP iv) Functional Role of DP v) Whether DP is Promoter or belongs to Promoter Group 	Mr. GHANSHYAM HEDA ABNPH6262K V.P (ENGG.) Engineering No
	B. If reporting is for immediate relative of DP <ul style="list-style-type: none"> i) Name of the immediate relative of DP ii) PAN of the immediate relative of DP 	No
	C. Details of transaction(s) <ul style="list-style-type: none"> i) Name of the scrip ii) No. of shares traded and value (Rs.) (Date-wise) 	Nitin Spinners Limited – Scrip Id : BSE -532698. NSE – NITINSPIN Bought 10 Shares on 22.08.2025 and sold 5 shares on 19.09.2025
3	D. In case value of Trade(s) is more than Rs.10 lacs in a calendar quarter <ul style="list-style-type: none"> i) Date of intimation of trade(s) by concerned DP/Director/Promoter/Promoter Group to Company under regulation 7 of SEBI (PIT) Regulations, 2015 ii) Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015 	Not Applicable. -Do-
4	Details of violations observed under Coe of Conduct	Mr. GHANSHYAM HEDA has executed Contra-Trade during six months period in the Company's Shares without any

CIN. : L17111RJ1992PLC006987

Regd. Office & Plant : 16-17 Km. Stone, Chittor Road, Hamirgarh, Bhilwara (Raj.) 311 025
Tel. : 286110 to 113, E-mail : nsl@nitinspinners.com, Website : www.nitinspinners.com

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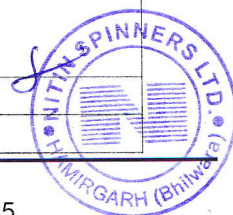


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		pre-clearance & intimation to the Company within Statutory time line. He was holding 510 shares before 22.08.2025. Purchased 10 shares on 22.08.2025 and sold 5 shares on 19.09.2025. Hence, resulted in contra trade within six months. He was not holding any Unpublished Price Sensitive Information ("UPSI") and Trade was done outside of Trading Window Closure period.
5	Action taken by Listed Company/ Intermediary/ Fiduciary	The Company has taken following actions: a. Sought explanation from Mr. GHANSHYAM HEDA in writing for committing the aforesaid violation; and b. Issued a warning letter to him to strictly adhere as per the statutory requirements henceforth and levied a penalty of Rs. 2000/- for contra trade after taking into account the relevant facts and in terms of the provisions of Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders
6	Reasons recorded in writing for taking action stated above	Following points have been considered while taking action in terms of the Company's Code of Conduct: 1. Mr. GHANSHYAM HEDA was not in possession of any Unpublished Price Sensitive Information ("UPSI"). 2. Mr. GHANSHYAM HEDA conducted the trade after the opening of Trading Window. 3. Such violation was first instance and there was no history of earlier violation on the part of Mr. GHANSHYAM HEDA
7	Details of the previous instances of violations, if any, since last financial year	No
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	Online
	In case of Online :	
	Particulars	Details



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NITIN	Name of the transferor	NITIN SPINNERS LIMITED
	Bank Name, Branch and Account Number	Bank of Baroda Mid Corp Branch , Bhilwara. 311001 Account No 01220500000168
	UTR/Transaction reference Number	251203252555480
	Transaction date	03.12.2025
	Transaction Amount (in Rs.)	Rs2000/-
9	Any other relevant information	Nil

Yours faithfully,

For Nitin Spinners Limited



Sudhir Garg

Company Secretary & VP (Legal)

PAN : ABBPK6037F

E-mail : sudhirgarg@nitinspinners.com

Date 03.12.2025

Place : Bhilwara

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