



Pokarna Limited

Date: 05th May, 2022.

Department of Corporate Services, B.S.E Limited, Phiroze Jeebhoy Towers, Dalal Street, Mumbai – 400001. Scrip Code : 532486	Listing Department, National Stock Exchange of India Ltd, Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai – 400051. Scrip Code: POKARNA
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Dear Sir/Madam,

Sub: Reporting of violations under SEBI (Prohibition of Insider Trading) Regulations, 2015

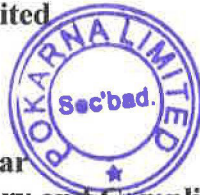
With reference to the Company's Prohibition of Insider Trading Code read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, we are enclosing herewith the report on violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the format prescribed by SEBI Circular SEBI/HO/ISD/ISD /CIR/P/2020/135 dated July 23, 2020.

You are requested to kindly take the above information on your records.

Thanking you,

For Pokarna Limited


Babita Chandrakar
Company Secretary and Compliance Officer



Encl: as above

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

Sl no.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Pokarna 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	Mr. Manish Kumar Bhagchand Pokarna
	ii. PAN of the DP	ADYPP7464A
	iii. Designation of DP	General Manager
	iv. Functional Role of DP	Projects
	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	Mrs. Jamuna Bai Pokarna
	ii. PAN of the immediate relative of DP	AEWPP1349H
	C. Details of transaction(s)	
	i. Name of the scrip	BSE Scrip code: 532486 NSE Symbol: POKARNA
	ii. No of shares traded and value (Rs.) (Date-wise)	As per Annexure A
	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	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	i. Execution of trades in shares of the Company by immediate relative of DP during trading window closure ii. Execution of contra trades in shares of the Company by the immediate relative of DP.
5	Action taken by Listed company/ Intermediary/Fiduciary	i. instructed to remit 100% of the profits made i.e., Rs.21,274.67 , in violation of Code of Conduct and additional penalty amounting of Rs.5,000 . Total amount of Rs.26,274.67 to be remitted to SEBI-IEPF account by the DP.



		ii. Warning letter issued to the DP for violation of Code. iii. Cautioned him not to repeat any violation in future under the Code.
6	Reasons recorded in writing for taking action stated above	Violation of Clause 6.1 of Code i.e., Purchase of shares during the Trading window closure and clause 6.6 of Code i.e., execution of contra trade.
7	Details of the previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Payment (paid on 05 th May, 2022)
	ii. Details of transfer/payment	
	In case of Online	
	Particulars	Details
	Name of the transferor	Mr. Manish Kumar Bhagchand Pokarna
	Bank Name, branch and Account number	Name: HDFC – Usha Kiran Complex, SD Road, Secunderabad. Account no.: 00421050285825
	UTR/Transaction reference Number	N125221944817645
	Transaction date	05 th May, 2022
	Transaction Amount (in Rs.)	Rs.26,274.67
	In case of Demand Draft (DD): Not Applicable	
	Particulars	Details
	Bank Name and branch	
	DD Number	
	DD date	
	DD amount (in Rs.)	
9	Any other relevant information	None

Yours Faithfully,

For Pokarna Limited




Babita Chandrakar

Company Secretary & Compliance Officer

PAN: BDRPC0886R

Email id: companysecretary@pokarna.com

Encl: as above

Annexure – A

Date	No. of Shares	Nature of Transaction	Total Amount (inclusive of tax) (Rs.)
20/04/2022	1000	Bought	6,64,650.14
21/04/2022	800	Sold	5,49,901.00
22/04/2022	200	Sold	1,36,023.81
Profit on sale of Shares			21,274.67

