RATNAVEER

30th October, 2023

To National Stock Exchange of India Limited, Exchange Plaza, Plot No. C/1, G Block, Bandra-Kurla Complex, Bandra (East), Mumbai –400051 NSE Scrip Symbol: RATNAVEER Kind Attn.: Listing Department.	To BSE Limited Phiroze Jeejeebhoy Towers,21st Floor, Dalal Street, Mumbai – 400001 BSE Scrip Code: 543978 Kind Attn.: Corporate Relationship Department.

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

Ref: SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020

Dear Sir/Madam,

In terms of Company's Code of Conduct (To Regulate, Monitor and Report of Trading by Designated Persons) ("Insider Trading Code ") read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, we hereby submit a report in respect of violation of Insider Trading Code of the Company as per format specified by SEBI vide its Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Kindly take the above information on your record and oblige.

Thanking you,

For Ratnaveer Precision Engineering Limited
(Erstwhile Ratnaveer Metals Limited)

VIJAY RAMANLAL SANGHAVI
Digitally signed by VIJAY RAMANLAL SANGHAVI
Date: 2023.10.30 16:38:05 +05'30'

Vijay Sanghavi
Managing Director
DIN: 0049592

Encl: As above

RATNAVEER PRECISION ENGINEERING LIMITED
(Formerly Known as RATNAVEER METALS LIMITED)
Plant : E-77, G.I.D.C. Savli (Manjusar), Dist. Vadodara - 391776. (Gujarat) India.
Office : 703 & 704, "Ocean", Vikram Sarabhai Campus, Vadi Wadi, Vadodara-390023.
P : ☎ +91 2667 264594 / 264595 O : ☐ +91 - 84878 78075
CIN : U27108GJ2002PLC040488 Web : www.ratnaveer.com

Report by Ratnaveer Precision Engineering Ltd for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

<table>
<tr><th>Sr. No.</th><th>Particulars</th><th>Details</th></tr>
<tr><td>1</td><td>Name of the listed company</td><td>Ratnaveer Precision Engineering Limited</td></tr>
<tr><td>2</td><td>Please tick appropriate checkbox Reporting in capacity of :
☐ Listed Company
☐ Intermediary
☐ Fiduciary</td><td>Listed Company</td></tr>
<tr><td rowspan="11">3</td><td colspan="2">A. Details of Designated Person (DP)</td></tr>
<tr><td>i. Name of the DP</td><td>Mr. Pritesh jayantilal Shah</td></tr>
<tr><td>ii. PAN of the DP</td><td>ARTPS7601M</td></tr>
<tr><td>iii. Designation of DP</td><td>Manager- Accounts</td></tr>
<tr><td>iv. Functional Role of DP</td><td>Finance & Accounts</td></tr>
<tr><td>v. Whether DP is Promoter or belongs to Promoter Group</td><td>No</td></tr>
<tr><td colspan="2">B. If Reporting is for immediate relative of DP</td></tr>
<tr><td>i. Name of the immediate relative of DP</td><td>Not Applicable</td></tr>
<tr><td>ii. PAN of the immediate relative of DP</td><td>Not Applicable</td></tr>
<tr><td colspan="2">C. Details of transaction(s)</td></tr>
<tr><td>i. Name of the scrip</td><td>Ratnaveer Precision Engineering Limited

NSE Listing Code: RATNAVEER
BSE Listing Code: 543978</td></tr>
<tr><td>ii. No of shares traded and value (Rs.) (Date- wise)</td><td>
<table>
<tr><th>Date</th><th>Transaction</th><th>No of Share</th><th>Value (Rs)</th></tr>
<tr><td>03/10/2023</td><td>Buy</td><td>19</td><td>2143.20</td></tr>
<tr><td>13/10/2023</td><td>Sale</td><td>140</td><td>17990.00</td></tr>
<tr><td>13/10/2023</td><td>Sale</td><td>69</td><td>8211.00</td></tr>
</table>
</td></tr>
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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	Not Applicable
	ii. Date of intimation of trade(s) by Company to stock exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	**Details of violations observed under Code of Conduct**	Execution of trade during the closure of trading window.
5	**Action taken by Listed company**	The Company had issued a warning letter and instructed to remit 100% of the profit made i.e. Rs. 831/- 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 trade during the closure of trading window.
7	**Details of the 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 – **ii. Details of transfer/payment In case of Online** **iii. In case of Demand Draft (DD):**	Online Payment on 30.10.2023 Rs. 831/- Transaction Ref No AXOMB33035084334 **Name of the Transferor:** Pritesh Jayantilal Shah Name of Beneficiary SEBI – IPEF Bank Name Bank of India Bank Branch Bandra Kurla Complex (BKC) Account Number 012210210000008 IFSC Code BKID0000122
9	**Any other relevant information**	Nil

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