RSWM Limited
an LNJ Bhilwara Group Company

PROUD TO BE INDIAN
PRIVILEGED TO BE GLOBAL

RSWM/SECTT/2021
February 12, 2021

National Stock Exchange of India Limited
Listing Department,
Exchange Plaza, C-1, Block - G,
Bandra-Kurla Complex,
Bandra (East),
MUMBAI - 400 051.

Scrip Code: RSWM

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

Dear Sir,

This intimation is with regard to the occurrence of an event of inadvertent trade by designated persons of the Company during the trading window closure period & Contra Trade transactions.

The relevant details of the events are attached as Annexure A.

In compliance with the SEBI (PIT) Regulations, the Company shall also report the above violation to SEBI accordingly.

We request you to kindly take note of the same.

Thanking you,

Yours faithfully,
For RSWM LIMITED

SURENDER GUPTA
AVP – LEGAL & COMPANY SECRETARY
FCS – 2615

Encl.: As above

rswm.investor@lnjbhilwara.com

Annexure A

Report by M/s RSWM Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

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

Sr. No	Particulars	Details
1.	Name of the listed company/ Intermediary/Fiduciary	RSWM 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 ii. PAN of the DP iii. Designation of DP iv. Functional role of DP v. Whether DP is Promoter or belongs to Promoter Group B. If Reporting is for immediate relative of DP i. Name of the immediate relative of DP ii. PAN of the immediate relative of DP C. Details of transaction(s) i. Name of the scrip ii. No of shares traded and value (Rs.) (Date wise)	 Mr. Pankaj B. Porwal AJXPP3551F Manager Marketing No Mrs. Reena Pankaj Porwal BVZPP8067K RSWM Limited –Equity Shares No. of shares traded and value (Rs.) (Date wise)

Sr. No.	Date of Purchase	Qty.	Amount (Rs.)
1	9th August, 2019	50 (Buy)	6,198.54

RSWM LIMITED

<table>
<tr><td></td><td></td><td>
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<tr><td>2</td><td>13th August, 2019</td><td>150 (Buy)</td><td>17,527.43</td></tr>
<tr><td></td><td>Total</td><td></td><td>23,525.97</td></tr>
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<table>
<tr><th>Sr. No.</th><th>Date of Sale</th><th>Qty.</th><th>Amount (Rs.)</th></tr>
<tr><td>1</td><td>13th February, 2020</td><td>150 (Sale)</td><td>16,218.69</td></tr>
<tr><td>2</td><td>21st August, 2020</td><td>200 (Sale)</td><td>18,713.68</td></tr>
<tr><td>3</td><td>5th January, 2021</td><td>50 (Sale)</td><td>7,155.97</td></tr>
<tr><td></td><td>Total</td><td></td><td>42,088.34</td></tr>
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</td></tr>
<tr><td></td><td>D. In case value of trade is more than Rs. 10 lacs in a calendar quarter</td><td>NA</td></tr>
<tr><td></td><td>I. Date of intimation of trade(s) by concerned DP/director/promoter//promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</td><td>NA</td></tr>
<tr><td></td><td>II. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</td><td>NA</td></tr>
<tr><td>4.</td><td>Details of violations observed under Code of Conduct</td><td>I. Clause 4 of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended) (Clause 2.2 of Code of Company) - Trading during Closure of Trading Window.
II. Clause 10 of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended) (Clause 2.5 of Code of Company) Executed Contra Trade in respect of the transactions.</td></tr>
<tr><td>5.</td><td>Action taken by Listed company/~~Intermediary/Fiduciary~~</td><td>The Audit Committee and Board of Directors of the Company at their meeting held on 11th February, 2021 reviewed the matter and this being first instance of violation by the aforementioned Designated Person imposed fine of Rs. 5,000/- which is to be</td></tr>
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RSWM LIMITED

		credited to the IEPF through the online mode or by way of a demand draft (DD) in favour of the Board (i.e. SEBI – IEPF) payable at Mumbai. Also issued a warning to take utmost case in future to avoid further stringent action.
6.	Reasons recorded in writing for taking action stated above	Breach of Company's Code of Conduct of Regulating Monitoring and Reporting Trading by Insiders and SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended)
7.	Details of the previous instances of violations, if any, since last financial year	Details of violations since last financial year given in point no. 3 above.
8.	If any amount collected for Code of Conduct violation(s) i. Mode of transfer to SEBI-IEPF (Online/Demand draft)	The above decision of Audit Committee and Board of Directors of the Company has been intimated to the aforementioned Designated Person immediately after the conclusion of the Audit Committee and Board Meeting i.e. 11th February, 2021 and also directed to deposited / transferred the imposed penalty /fine of Rs. 5,000/- to the SEBI-IEPF account as per SEBI Circular dated 23rd July, 2020. Accordingly, he has deposited the fine into the said account and a receipt of the same is enclosed.
9.	Any other relevant information Name of Compliance Officer PAN of Compliance Officer Email of Compliance Officer Upload File Date Place Contact for OTP	 Surender Gupta AEVPG4534L skg@lnjbhilwara.com 12th February, 2021 Noida (U.P.) 9818646484

Date : - 12th February 2021

Shri Surender Gupta Ji
AVP Legal & Company Secretary
RSWM Limited
Noida

Subject - **Violation of Insider Trading Code**

Dear Sir

I acknowledge receipt of Notice dated 11th Feb 21 towards Penalty amount of Rs. 5000/- to be paid for Violation of Insider Trading Code in my wife's name Mrs Reena Pankaj Porwal.

Please note that penalty amount of Rs. 5000/- has been paid by IMPS Reference NO 10431119691 Dated 12th Feb 21. To SEBI-IPEF Account.

RRN Reference No.	User Reference No.	Transaction Date	From Account	Amount	Beneficiary Mobile / Account Number	MMID / IFSC Code
104311196914	104311117031	12-02-21	11050102371	5,000.00	12210210000008	BKID0000122

Bank Statement are also attached for your reference please.

I confirm that I will take utmost care in future to avoid such mistake

Yours Sincerely

Pankaj Porwal

(Pankaj B. Porwal)
Employee Code – D90945

HDFC BANK
We understand your world

MR. PANKAJ PORWAL
B205 NEW VENKATESH SAGAR C H S
150 FEET ROAD NEAR FLYOVER
NEXT TO HDFC BANK LTD
BHAYANDER WEST 401101
MAHARASHTRA INDIA

JOINT HOLDERS : REENA PORWAL

Nomination : Not Registered

Account Branch : NARIMAN PT TULSIANI CHMBRS
Address : 101-104 TULSIANI CHAMBERS
FREE PRESS JOURNAL MARG
NARIMAN POINT
City : MUMBAI 400 021
State : MAHARASHTRA
Phone no. : 022-61606161
OD Limit : 0.00
Currency : INR
Email : pankaj_porwal2003@yahoo.com
Cust ID : 6639257
Account No : 00011050102371 PB Customer
A/C Open Date : 08/10/2004
Account Status : Regular
RTGS/NEFT IFSC: HDFC0000001 MICR : 400240003
Branch Code : 1 Product Code : 105

From : 12/02/2021 To : 12/02/2021

Statement of account

Date	Narration	Chq./Ref.No.	Value Dt	Withdrawal Amt.	Deposit Amt.	Closing Balance
12/02/21	IMPS-104311196914-SEBIIPEF-BKID-XXXXXXXX XXX0008-PENALTY PAYMEENT	0000104311196914	12/02/21	5,000.00		125,892.67
12/02/21	CHQ DEP - MICR 8 CLEARING - BANSWARA, RA	0000000000370202	15/02/21		70,124.00	196,016.67

STATEMENT SUMMARY :-

Opening Balance	Dr Count	Cr Count	Debits	Credits	Closing Bal
130,892.67	1	1	5,000.00	70,124.00	196,016.67

Generated On: 12-Feb-2021 14:33 **Generated By: 6639257** **Requesting Branch Code: NET**

This is a computer generated statement and does not require signature.

Annexure A

Report by M/s RSWM Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

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

Sr. No	Particulars	Details
1.	Name of the listed company/ Intermediary/Fiduciary	RSWM 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 ii. PAN of the DP iii. Designation of DP iv. Functional role of DP v. Whether DP is Promoter or belongs to Promoter Group B. If Reporting is for immediate relative of DP i. Name of the immediate relative of DP ii. PAN of the immediate relative of DP C. Details of transaction(s) i. Name of the scrip ii. No of shares traded and value (Rs.) (Date wise)	Mr. Sumeet Ajaypal Singh CBPPS6539E Assistant Internal Audit No RSWM Limited –Equity Shares No. of shares traded and value (Rs.) (Date wise)

Sr. No.	Date of Purchase	Qty.	Amount (Rs.)
1	11th January, 2021	20 (Buy)	3,228.00
	Total		**3,228.00**

RSWM LIMITED

	D. In case value of trade 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 II. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA NA NA
4.	Details of violations observed under Code of Conduct	I. Clause 4 of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended) (Clause 2.2 of Code of Company) - Trading during Closure of Trading Window.
5.	Action taken by Listed company/~~Intermediary/Fiduciary~~	The Audit Committee and Board of Directors of the Company at their meeting held on 11th February, 2021 reviewed the matter and this being first instance of violation by the aforementioned Designated Person imposed fine of Rs. 1,500/- which is to be credited to the IEPF through the online mode or by way of a demand draft (DD) in favour of the Board (i.e. SEBI – IEPF) payable at Mumbai. Also issued a warning to take utmost case in future to avoid further stringent action.
6.	Reasons recorded in writing for taking action stated above	Breach of Company's Code of Conduct of Regulating Monitoring and Reporting Trading by Insiders and SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended)
7.	Details of the previous instances of violations, if any, since last financial year	Details of violations since last financial year given in point no 3 above.
8.	If any amount collected for Code of Conduct violation(s) i. Mode of transfer to SEBI-IEPF (Online/Demand draft)	The above decision of Audit Committee and Board of Directors of the Company has been intimated to the aforementioned Designated Person immediately after the

RSWM LIMITED

		conclusion of the Audit Committee and Board Meeting i.e 11th February, 2021 and also directed to deposited / transferred the imposed penalty /fine of Rs. 1,500/- to the SEBI-IEPF account as per SEBI Circular dated 23rd July, 2020. Accordingly, he has deposited the fine into the said account and a receipt of the same is enclosed.
9.	Any other relevant information Name of Compliance Officer PAN of Compliance Officer Email of Compliance Officer Upload File Date Place Contact for OTP	 Surender Gupta AEVPG4534L skg@lnjbhilwara.com 12th February, 2021 Noida (U.P.) 9818646484

Date: - 12th Feb'2021

Shri Surender Gupta Ji
AVP Legal & Company Secretary
RSWM Limited
Noida

Subject: - **Violation of Insider Trading Code**

Dear Sir,

I acknowledge receipt of Notice dated 11th Feb'21 towards Penalty amount of Rs.1500/- to be paid for Violation of Insider Trading Code in my name Mr. Sumeet Ajaypal Singh.

Please note that penalty amount of Rs.1500/- has been paid by NEFT reference No. 43403322 dated 12th Feb'2021 to SEBI-IPEF Account.

E-receipt

Transaction Reference Number:	43403322
Transaction Type	NEFT Fund Transfer
Date of Transaction	12/02/2021
From ICICI Bank Account	157701518283-SUMEET AJAYPAL SINGH
To payee	012210210000008-SEBI
Transaction Amount(Rs.)	INR 1,500.00
Remarks	RSWM Penalty

Bank statement are also attached for your ready reference please.

I confirm that I will take utmost care in future to avoid such mistake.

Thanks & Regards



Sumeet Ajaypal Singh

Employee Code- R00384

ICICI Bank

E-receipt

Transaction Reference Number:	43403322
Transaction Type	NEFT Fund Transfer
Date of Transaction	12/02/2021
From ICICI Bank Account	157701518283-SUMEET AJAYPAL SINGH
To payee	012210210000008-SEBI
Transaction Amount(Rs.)	INR 1,500.00
Remarks	RSWM Penalty