RSWM Limited
an LNJ Bhilwara Group Company

PROUD TO BE INDIAN
PRIVILEGED TO BE GLOBAL

RSWM/SECTT/2021
July 30, 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 Sale	Qty.	Amount (Rs.)
1	16th July, 2021	50 (Sale)	17,122.50

RSWM LIMITED

	D. In case value of trade is more than Rs. 10 lacs in a calendar quarter	NA
	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. 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 Company as per the guidelines given by the Board of Directors to deal with cases of violation of Code of Conduct for Regulating, Monitoring & Reporting Trading of the Company under SEBI (Prohibition of Insider Trading) Regulations, 2018, has imposed a fine of Rs. 15,000/- which has been credited to IEPF Account with HDFC Bank through UTR No. 0000121016148791 dated 29th July, 2021 through the online mode. A warning notice also has been issued 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	N.A.
8.	If any amount collected for Code of Conduct violation(s)	

RSWM LIMITED

	i) Mode of transfer to SEBI-IPEF (Online/Demand draft)	Online
	ii) Details of transfer/payment	

In case of Online

Particulars	**Details**
Name of the transferor	Mr. Pankaj Porwal
Bank Name, Branch and Accounts Number	HDFC Bank Nariman Point, Mumbai-400021
UTR/Transaction reference Number	0000121016148791
Transaction Date	29/07/2021
Transaction Amount (in Rs.)	15,000.00

9.	Any other relevant information	
	Name of Compliance Officer	Surender Gupta
	PAN of Compliance Officer	AEVPG4534L
	Email of Compliance Officer	skg@lnjbhilwara.com
	Upload File	
	Date	30th July, 2021
	Place	Noida (U.P.)
	Contact for OTP	9818646484

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