



Ref: D/2022-23/01

06th April, 2022

To,
Listing Department
National Stock Exchange of India Limited
'Exchange Plaza'. C-1, Block G,
Bandra Kurla Complex, Bandra (E),
Mumbai - 400 051
Symbol: SBC

To,
Listing Department
BSE Limited
P.J. Towers, Dalal Street
Mumbai-400001
Scrip Code: 542725

Sub.: Report of violation relating to the Code of Conduct (CoC) under the 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,

Pursuant to the captioned subject, we enclose herewith the report by the Company for the violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the format of Annexure-A as prescribed by the SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Please take the same on record.

Thanking you.

Yours faithfully,

For SBC Exports Limited

FOR SBC EXPORTS LTD.
[Signature]
Company Secretary

(Hariom Sharma)
Company Secretary
M. No. A41738

Encl.: As Above

CIN: L18100UP2011PLC043209

Corp. Office : 49/95, Site-IV, Sahibabad Industrial Area, Ghaziabad, Uttar Pradesh - 201010

Head Office : House No. 20, Lohiya Talab, Choti Basahi, P.O. Vindhyachal Mirzapur, Uttar Pradesh - 231307

Tel. : 0120-2895246, **Cutomer Care :** +8303-300-100, **E-mail :** info@sbceportslimited.com, **Web. :** www.sbcexportslimited.com

Annexure - A

Report by SBC Exports 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

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	SBC Exports 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	SBC Finmart Limited
	ii. PAN of the DP	AAUCS0396L
	iii. Designation of DP	Not applicable
	iv. Functional Role of DP	Not Applicable
	v. Whether DP is Promoter or belongs to Promoter Group	Yes. DP belongs to the Promoter Group of the Company.
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	SBC EXPORTS LIMITED NSE – SBC BSE – 542725
	ii. No of shares traded and value (Rs.) (Date- wise)	Purchased 6,000(Six thousand) Equity shares @ Rs. 5.75/- per share, aggregating Rs. 34,500/- (Thirty four thousand five hundred rupees only) on 01 st April, 2022. Sold 6,000(Six thousand) Equity shares @ Rs. 5.75/- per share, aggregating Rs. 34,500/- (Thirty Four Thousand Five Hundred Rupees only) on 01 st April, 2022.

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	Purchase of 6,000 equity shares of the Company and subsequent sale thereof on 1.04.2022 i.e. during the trading window closure period. (Trading window was closed from 1 st April, 2022 till the completion of 48 hours after declaration of the Audited Financial Results for the quarter and year ended March 31, 2022)
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Company sought clarification from SBC Finmart Limited on the violations and the same was responded by Mr. Gaurav Gupta, Director of SBC Finmart Limited on 04.04.2022 stating that the aforesaid trades were executed by the broker inadvertently and he was unaware with the fact of closure period of trading window for Company's management, promoter and employee. Mr. Gaurav Gupta, Director of SBC Finmart Limited tendered sincere apologies in writing and ensure the company that this thing will be taken care of very well in future. Since the trading value of the transaction was very small and SBC Finmart Limited squared off the position at the same price on same day which means no profit was made on the transaction made during closure of trading window, the violation falls under the category of "Low Severity" In view of the above fact and in accordance with the Insider Trading Policy of the Company, a warning letter has been issued to M/s SBC Finmart Limited by the Company. Further, no monetary penalty was imposed this time on M/s SBC Finmart Limited however, any violation of the SEBI Regulations and of the internal policies of the company in future, may lead to the imposition of monetary penalty as well.

6	Reasons recorded in writing for taking action stated above	The DP is neither involved in any of the decisions of the Company nor takes part in control of any affairs of the Company. As submitted by SBC Finmart Limited (DP), the purchase of shares by DP during the period of closure of Trading Window was entirely inadvertent and also to rectify the effect of purchase, DP sold the purchased shares immediately. However, the same is a violation in terms of the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and considering all aspects including their submission that the Company was inadvertently not aware of the closure of Trading window and the purchase at such time was unintentional and also the fact that it is the first case of violation, the Company has taken the aforesaid action.										
7	Details of the previous instances of violations, if any, since last financial year	None										
	ii. Details of transfer/payment											
	<table><tr><th>Particulars</th><th>Details</th></tr><tr><td>Name of the transferor</td><td></td></tr><tr><td>Bank Name, branch and Account number</td><td></td></tr><tr><td>UTR/Transaction reference Number</td><td></td></tr><tr><td>Transaction date</td><td></td></tr></table>		Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date	
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	Transaction date											
	In case of Online:											
	In case of Demand Draft (DD): N.A.											
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	Bank Name and branch											
	DD Number											
DD date												
DD amount (in Rs.)												
9	Any other relevant information	None										

Date: 06th April, 2022
Place: Ghaziabad

Yours faithfully,
For SBC EXPORTS LIMITED

FOR SBC EXPORTS LTD.

Company Secretary

Hariom Sharma
Company Secretary