

Date: 6th February 2025

To,
National Stock Exchange of India Limited ("NSE"),
The Listing Department
Exchange Plaza, 5th Floor,
Plot No. C/1, G Block, Bandra-Kurla Complex
Bandra (East), Mumbai – 400 051.

To,
BSE Limited ("BSE"),
Corporate Relationship Department,
2nd Floor, New Trading Ring,
P.J. Towers, Dalal Street,
Mumbai – 400 001.

NSE Symbol: SULA
ISIN: INE142Q01026

BSE Scrip Code: 543711
ISIN: INE142Q01026

Dear Sir/ Madam,

Sub: - Reporting of violation of Code of Conduct for Prohibition of Insider Trading

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

We would like to inform that one of the designated person of Sula Vineyards Limited ("Company"), has traded in the equity shares of the Company in violation of the Code read with SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations").

In compliance with SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020, a report for the aforesaid violation by the Designated Person is annexed as "Annexure - A".

Kindly take the above information on record.

Thanking you,
For Sula Vineyards Limited

Shalaka Koparkar
Company Secretary and Compliance Officer
Membership No.: A25314

Encl. As above



Sula Vineyards Limited

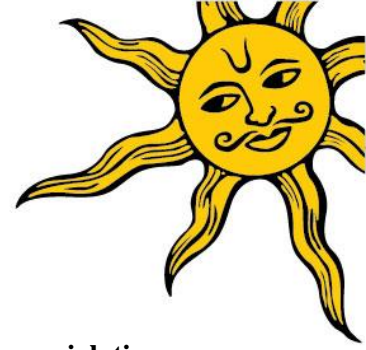
(formerly known as Sula Vineyards Private Limited)

Regd. Office: 901, Solaris One, N.S. Phadke Marg, Andheri (E), Mumbai 400069, Maharashtra, India.

Tel: 022-6128 0606/607 Email: info@sulawines.com CIN: L15549MH2003PLC139352

Winery: Gat 36/2, Govardhan Village, Gangapur-Savargaon Road, Nashik 422 222, Maharashtra, India Tel: +91 253 3027777/701

www.sulavineyards.com



Annexure A

Report by (Name of the listed company/ Intermediary/ Fiduciary) for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Sr. No.	Particulars	Details
1.	Name of the listed company/ Intermediary/Fiduciary	Sula Vineyards Limited
2.	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed on NSE & BSE
3.	A. Details of Designated Person (DP)	
	i. Name of the DP	Ms. Nidhi Mishra
	ii. PAN of the DP	FSTPM8511C
	iii. Designation of DP	Assistant Manager
	iv. Functional Role of DP	Finance & Accounts
	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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	Sula Vineyards Limited Scrip Code: 543711 Trading Symbol: SULA
	ii. No of shares traded and value (Rs.) (Date-wise)	Date: 9 th December 2024 No of shares traded: 10 Value: Rs. 434.20 (per share)
	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 As the value of trade does not exceed Rs. 10 lacs a calendar quarter
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI(PIT) Regulations, 2015	Not Applicable As the value of trade does not exceed Rs. 10 lacs in a calendar quarter

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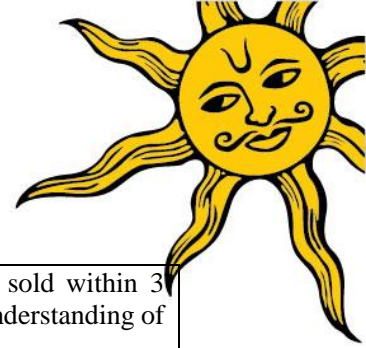
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4	Details of violations observed under Code of Conduct	10 shares were bought and sold within 3 days inadvertently and misunderstanding of provisions																		
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Company Secretary and Compliance Officer of the Company had issued a warning letter to Ms. Nidhi Mishra to strictly adhere to the provisions of the Code and also to remain diligent and be in complete compliance of the Code henceforth to avoid stringent actions for any subsequent violations.																		
6	Reasons recorded in writing for taking action stated above	Ms. Nidhi Mishra had admitted that the trade executed by her is in violation of the Code read with SEBI PIT Regulations, were unintentional and solely because of ignorance without any malafide intent.																		
7	Details of the previous instances of violations, if any, since last financial year	First time identification of violation of the Code and SEBI PIT regulations.																		
8	<p>If any amount collected for Code of Conduct violation(s)</p> <p>i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)</p> <p>ii. Details of transfer/payment</p> <p>In case of Online:</p> <table border="1" style="width: 100%;"> <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> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </table> <p>In case of Demand Draft:</p> <table border="1" style="width: 100%;"> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD amount (in Rs.)</td> <td></td> </tr> </table>	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (in Rs.)		Bank Name and branch		DD Number		DD date		DD amount (in Rs.)		None
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9	Any other relevant information	None																		

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