

11th November, 2021

To,  
The Manager,  
Listing Department,  
National Stock Exchange of India Limited  
'Exchange Plaza', C-1 Block G, Bandra-Kurla Complex,  
Bandra (East), Mumbai – 400051.

**SYMBOL: TOTAL**

**SUB: Reporting regarding Violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

Dear Sir/Madam,

This is to inform you that in terms of the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 Dated July 23, 2020, the details of violation of the Company's code of conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015 by the immediate relative of Designated Person along with the action taken by the Company thereon is enclosed as "Annexure A" to this letter.

Kindly take the same on record.

For **Total Transport Systems Limited**

Bhavik  
Shantilal  
Trivedi

Digitally signed by  
Bhavik Shantilal  
Trivedi  
Date: 2021.11.11  
19:32:02 +05'30'

**Bhavik Trivedi**  
**Company Secretary & Compliance officer**

**TOTAL TRANSPORT SYSTEMS LIMITED**

7th floor, T Square, Opp Chandivali Petrol Pump, Sakinaka,  
Andheri(E), Mumbai - 400 072. Maharashtra India.

**Report by Total Transport Systems 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/<br><del>Intermediary/Fiduciary</del>                                                                                                                                    | Total Transport Systems Limited                                                                                             |
| 2        | Please tick appropriate checkbox<br>Reporting in capacity of :<br><input checked="" type="checkbox"/> Listed Company<br><input type="checkbox"/> Intermediary<br><input type="checkbox"/> Fiduciary | Listed Company                                                                                                              |
| <b>3</b> | <b>A. Details of Designated Person (DP)</b>                                                                                                                                                         |                                                                                                                             |
|          | i. Name of the DP                                                                                                                                                                                   | Not Applicable                                                                                                              |
|          | 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>B. If Reporting is for immediate relative of DP</b>                                                                                                                                              |                                                                                                                             |
|          | i. Name of the immediate relative of DP                                                                                                                                                             | SIDDHARTH SANJIV POTNIS                                                                                                     |
|          | ii. PAN of the immediate relative of DP                                                                                                                                                             | CRMPP6577Q                                                                                                                  |
|          | <b>C. Details of transaction(s)</b>                                                                                                                                                                 |                                                                                                                             |
|          | i. Name of the scrip                                                                                                                                                                                | Total Transport Systems Limited                                                                                             |
|          | ii. No of shares traded and value (Rs.) (Date-wise)                                                                                                                                                 | 10 (Ten) Shares.<br>Traded Value of these 10 shares is Rs.486.50/- only<br>Date of Purchase: 1 <sup>st</sup> November, 2021 |
|          | <b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>                                                                                                                   |                                                                                                                             |
|          | 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                                                                                                                                                | Mr Siddharth Sanjiv Potnis transacted in 10 (Purchase) equity shares of the                                                 |

|   |                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---|-----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                       | <p>Company without obtaining pre-clearance approval from Compliance officer.</p> <p>The trading window of the Company was closed. The aforesaid trades were executed by Mr.Siddharth Sanjiv Potnis during trading window closure period.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5 | Action taken by Listed company/ <del>Intermediary/</del><br>Fiduciary | <p>The Company sought clarification from Mr.Siddharth Sanjiv Potnis on the violation and the same was responded by him stating that aforesaid trades were executed by him inadvertently. The Audit Committee and Board of Directors of the Company at their meeting held today i.e. 11<sup>th</sup> November, 2021 reviewed this matter and this being first instance of violation by the aforesaid person imposed following fines/penalties:-</p> <ol style="list-style-type: none"> <li>1. As per the Insider Trading policy of the Company, the Disciplinary action was taken and a penalty of Rs.100/- was levied and which was remitted by him.</li> <li>2. Verbal warning to take utmost care in future to avoid further stringent action.</li> <li>3. Restriction on him that he shall not trade/deal in the shares of the Company for six months.</li> </ol> |
| 6 | Reasons recorded in writing for taking action stated above            | <p>The Audit committee &amp; Board of Directors of the Company imposed a fine after taking into account the explanation furnished by Mr. Siddharth Sanjiv Potnis</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

|   |                                                                                    |                                                                                                                                                                                                                              |
|---|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                    | regarding inadvertent purchase of shares. Further the Audit committee and Board of Directors also considered the quantum of shares involved and it being first instance of Non-compliance of code of conduct of the Company. |
| 7 | Details of the previous instances of violations, if any, since last financial year | No previous instances of violations.                                                                                                                                                                                         |
| 8 | If any amount collected for Code of Conduct violation(s)                           |                                                                                                                                                                                                                              |
|   | i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)                           | Mode- Online                                                                                                                                                                                                                 |
|   | ii. Details of transfer/payment                                                    |                                                                                                                                                                                                                              |
|   | In case of Online:                                                                 |                                                                                                                                                                                                                              |
|   | <b>Particulars</b>                                                                 | <b>Details</b>                                                                                                                                                                                                               |
|   | Name of the transferor                                                             | TOTAL TRANSPORT SYSTEMS LIMITED                                                                                                                                                                                              |
|   | Bank Name, branch and Account number                                               | Axis Bank Limited<br>Sakinaka Branch<br>Account No<br>915020052954930                                                                                                                                                        |
|   | UTR/Transaction reference Number                                                   | AXISP00239356846                                                                                                                                                                                                             |
|   | Transaction date                                                                   | 11-11-2021                                                                                                                                                                                                                   |
|   | Transaction Amount (in Rs.)                                                        | 100/-                                                                                                                                                                                                                        |
|   | In case of Demand Draft (DD):                                                      |                                                                                                                                                                                                                              |
|   | <b>Particulars</b>                                                                 | <b>Details</b>                                                                                                                                                                                                               |
|   | Bank Name and branch                                                               | Not Applicable                                                                                                                                                                                                               |
|   | DD Number                                                                          | Not Applicable                                                                                                                                                                                                               |
|   | DD date                                                                            | Not Applicable                                                                                                                                                                                                               |
|   | DD amount (in Rs.)                                                                 | Not Applicable                                                                                                                                                                                                               |
| 9 | Any other relevant information                                                     | Not Applicable                                                                                                                                                                                                               |

Yours faithfully,

For **Total Transport Systems Limited**

Bhavik  
Shantilal  
Trivedi

Digitally signed by  
Bhavik Shantilal Trivedi  
Date: 2021.11.11  
19:35:12 +05'30'

**Bhavik Trivedi**

**Company Secretary & Compliance officer**

**PAN: AGWPT7882P**

**Email: [Bhavik.trivedi@mum.cpworldindia.com](mailto:Bhavik.trivedi@mum.cpworldindia.com)**

**Date: 11<sup>th</sup> November, 2021**

**Place: Mumbai**