

18th April, 2023

To

BSE Limited

25th Floor, Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Scrip Code – 511742

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor, Plot No. C/1,
G Block, Bandra-Kurla Complex,
Bandra (East), Mumbai – 400 051

NSE Symbol – UGROCAP

Sub: **Reporting 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 Designated Person (DP) along with the action taken by the Company thereon is enclosed to this letter as an ‘Annexure A’.

You are requested to take the same on your records.

Thanking you,

Yours faithfully,

For Ugro Capital Limited

Namrata Sajnani

Company Secretary and Compliance Officer

UGRO CAPITAL LIMITED

Registered Office Address: Equinox Business Park, Tower 3, 4th Floor, LBS Road, Kurla (West), Mumbai - 400070

CIN: L67120MH1993PLC070739

Telephone: +91 22 41821600 | **E-mail:** info@ugrocapital.com | **Website:** www.ugrocapital.com

Annexure A

Report by UGRO Capital 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	UGRO CAPITAL LIMITED
2	Please tick appropriate checkbox Reporting in capacity of : <ul style="list-style-type: none"> - Listed Company - Intermediary - Fiduciary 	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Ashutosh Kumar
	ii. PAN of the DP	DHZPK6675J
	iii. Designation of DP	Assistant Manager
	iv. Functional Role of DP	Quality Assurance Engineer • IT
	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	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	UGROCAP 511742
	ii. No of shares traded and value (Rs.) (Date- wise)	88 shares valuing to Rs. 14,256 sold on 10/04/2023
	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	Sold equity shares of the Company during the period of closure of Trading Window i.e. from 01/04/2023 till further notice

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5	Action taken by Listed company/ Intermediary/ Fiduciary	Warning letter has been issued to Mr. Ashutosh Kumar												
6	Reasons recorded in writing for taking action stated above	These shares were sold inadvertently by him due to a financial requirement. He has made a loss of Rs. 1,760/- on the trade. Shares were purchased before his joining the Company.												
7	Details of the previous instances of violations, if any, since last financial year	There have been no previous instances of violation from Mr. Ashutosh Kumar in the Company. This is the first instance of violation.												
9	If any amount collected for Code of Conduct violation(s)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Nil												
	ii. Details of transfer/payment	Nil												
	In case of Online:													
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DD Number														
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DD amount (in Rs.)														
9	Any other relevant information	Nil												

Date: 18th April, 2023
Place: Mumbai

Yours Faithfully,
For UGRO Capital Limited

Namrata Sajnani
Company Secretary and Compliance Officer

PAN: DAFPS6449F
Email Id: cs@ugrocapital.com

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