VASCON

Date: August 21, 2020

To,
National Stock Exchange of India Limited,
Listing Department,
Exchange Plaza,
Bandra (E), Mumbai – 400 051

Ref Symbol: VASCONEQ

To,
BSE Limited,
The Department of Corporate Services
Phiroze Jeejeebhoy Towers, Dalal Street,
Fort, Mumbai 400 001

Ref: Scrip Code: 533156

Dear Sir/ Madam,

Subject: Inadvertent violation of Code of Conduct for Prevention of Insider Trading of Vascon Engineers Limited by Designated Person

Pursuant to provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015, we hereby enclose the Report in Annexure A as prescribed under SEBI circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

The violation was brought to the notice of the Audit Committee in its meeting held on August 18, 2020 and being the first and inadvertent instance of violation of the Code by Designated Person, the Audit Committee has taken note thereof and levied a monetary penalty of Rupees 10,000/- for the inadvertent violation.

Kindly take the same on records.

Thanking you,

For **Vascon Engineers Limited**

VASCON ENGINEERS LIMITED

Vibhuti Dani
Company Secretary and Compliance Officer

Enclosures: As above.

Annexure A

Report by Vascon Engineers 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

<table>
<tr><th>Sr. No.</th><th>Particulars</th><th>Details</th></tr>
<tr><td>1.</td><td>Name of the listed company/ ~~Intermediary/Fiduciary~~</td><td>Vascon Engineers Limited</td></tr>
<tr><td>2.</td><td>Please tick appropriate checkbox
Reporting in capacity of :
☐ Listed Company
☐ Intermediary
☐ Fiduciary</td><td>Listed Company</td></tr>
<tr><td>3.</td><td colspan="2">A. Details of Designated Person (DP)</td></tr>
<tr><td></td><td>i. Name of the DP</td><td>Mr. Rajesh Dilip Mhatre</td></tr>
<tr><td></td><td>ii. PAN of the DP</td><td>AGPPM4683A</td></tr>
<tr><td></td><td>ii. Designation of DP</td><td>Chief Executive Officer- Real Estate</td></tr>
<tr><td></td><td>iv. Functional Role of DP</td><td>Chief Executive Officer- Real Estate</td></tr>
<tr><td></td><td>v. Whether DP is Promoter or belongs to Promoter Group</td><td>No</td></tr>
<tr><td></td><td colspan="2">B. If Reporting is for immediate relative of DP</td></tr>
<tr><td></td><td>i. Name of the immediate relative of DP</td><td>Not Applicable</td></tr>
<tr><td></td><td>ii. PAN of the immediate relative of DP</td><td>Not Applicable</td></tr>
<tr><td></td><td colspan="2">C. Details of transaction(s)</td></tr>
<tr><td></td><td>i. Name of the scrip</td><td>Equity Shares of Vascon Engineers Limited</td></tr>
<tr><td></td><td>ii. No of shares traded and value (Rs.) (Date-wise)</td><td>
<table>
<tr><th>Date</th><th>No of shares</th><th>Value (INR)</th></tr>
<tr><td>17-06-2020</td><td>10,000</td><td>85,254.00</td></tr>
<tr><td>18-06-2020</td><td>60,000</td><td>555,000.00</td></tr>
<tr><td>19-06-2020</td><td>30,000</td><td>288,042.85</td></tr>
<tr><td>22-06-2020</td><td>10,000</td><td>97,184.05</td></tr>
</table>
</td></tr>
<tr><td></td><td colspan="2">D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</td></tr>
<tr><td></td><td>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</td><td>July 30, 2020</td></tr>
<tr><td></td><td>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI</td><td>July 30, 2020</td></tr>
</table>

VASCON ENGINEERS LIMITED

	(PIT) Regulations, 2015	
4.	Details of violations observed under Code of Conduct	The violation is due to trade executed and further failure to intimate the Company within 2 trading days for an amount exceeding of Rs. 10,00,000/- pursuant to regulation 7(2) (a) of SEBI (PIT) Regulations, 2015.
5.	Action taken by Listed company/~~Intermediary/ Fiduciary~~	• Levied a penalty of ₹. 10,000/- being first violation. • Cautioned Designated Person not to repeat such violation of Code in future.
6.	Reasons recorded in writing for taking action stated above	This was the first instance of violation wherein Designated Person executed a trade for a value exceeding ₹ 10,00,000/- and failed to intimate the Company in accordance with the provisions of SEBI (PIT) Regulations, 2015. On the basis of explanation/reply provided by Designated Person to the Company, it seems that the trade value exceeded inadvertently without the intent to violate the provisions of the Code.
7.	Details of the previous instances of violations, if any, since last financial year	Not Applicable
8.	If any amount collected for Code of Conduct violation(s)	
	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	Vascon Engineers Limited
Bank Name, Branch and Account No	Union Bank of India , Koregaon Park 470301010035049
UTR/Transaction Reference Number	Trans Id- S83293835
Transaction Date	August 21, 2020
Transaction Amount (in Rs)	10,000/-

VASCON ENGINEERS LIMITED

	In case of Demand Draft	**NA**
9.	Any other relevant information	**NIL**

Yours Faithfully
Name and Signature of Compliance Officer

VASCON ENGINEERS LIMITED

Date: **August 21, 2020**
Place: **Pune**

Vibhuti Darshin Dani
PAN: **ANEPM9300N**
Email ID: compliance.office@vascon.com