



# VIBHOR STEEL TUBES LTD.

(Formerly known as VIBHOR STEEL TUBES (P) LTD.)

CIN: L27109HR2003PLC035091, Regd. Address: Plot No. 2, Industrial Development Colony, Delhi Road, Hisar (Haryana) - 125005 India, Tel No.: 01662-237359, 222710, Email Id: [contact@vstlindia.com](mailto:contact@vstlindia.com), Website: [www.vstlindia.com](http://www.vstlindia.com)

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Date: 02-12-2024

To, Department of Corporate Affairs, BSE LIMITED, P.J Towers, Dalal Street, Mumbai – 400001	To, Listing Department National Stock Exchange of India Limited Exchange Plaza, C-1 Block G, Bandra Kurla Complex Bandra [E], Mumbai – 400051
<b>BSE Scrip Code: 544124</b>	<b>NSE Symbol: VSTL</b>

Dear Sir/Madam,

**Sub: Reporting of violations under SEBI (Prohibition of Insider Trading) Regulations, 2015.**

This is with reference to the Company's Insider Trading Code of Conduct for Prevention of Insider Trading to regulate, monitor and report trading by Designated Persons and other Connected Persons as per the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find enclosed herewith the report related to the violation of Company's Code of Conduct for Prevention of Insider Trading by a Connected Person, in the format prescribed by SEBI vide its Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Thanking you,

Yours faithfully,

**FOR VIBHOR STEEL TUBES LIMITED**

**Mr. Lovkesh**

**Company Secretary & Compliance Officer**

**Mem No.: A68975**



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## Annexure-1

### Report by Colgate - Palmolive (India) 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) Regulation, 2015]

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	VIBHOR STEEL TUBES 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 Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mrs. Parul Jain
	ii. PAN of the DP	*****939C
	iii. Designation of DP	HR Manager
	iv. Functional Role of DP	Recruitment
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	NA
	ii. PAN of the immediate relative of DP	NA
	<b>C. Details of transaction(s)</b>	
	i. Name of the script	BSE: 544124 NSE: VSTL
	ii. No of shares traded and value (Rs.) (Date-wise)	A) Sell No of shares: -1287 Date of transaction: 28/08/2024 Total Consideration: -Rs. 3,20,308.56/-  B) Buy No of shares: - 1 Date of transaction: 16/09/2024 Total Consideration: 270.82
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter - N.A.</b>	



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Sr. No.	Particulars	Details
	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 traded value is less than Rs.10 lakhs in the 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 traded value is less than Rs.10 lakhs in the calendar quarter.
4	Details of violations observed under Code of Conduct #	<p>There is violation of Contra Trade as the Designated Person bought one (1) share on 16/09/2024 within a period of 6 (Six) Months from the date of sale of 1287 shares on 28/08/2024.</p> <p>Further the Designated Person had neither sought pre-clearance for buying the share on 16/09/2024 nor made post trade intimation.</p> <p># Please note that Pre-clearance approval and post trade intimation was made for trading done on 28/08/2024</p>
5	Action taken by Listed company/ Intermediary/ Fiduciary	The warning letters were issued to the Designated Person. Considering the amount of Contra trade was insignificant, no penalty as levied. Further the Designated Person was advised to follow the Company's code of conduct in letter and spirit and not to indulge in such act in future. The Designated Person was also directed that in the event of future violation of the Code monetary penalty will be levied by the Company.
6	Reasons recorded in writing for taking action stated above	The Company has issued a warning letter to the Designated Person. The Designated Person has confirmed that the violation was solely due to lack of knowledge and awareness of PIT Regulations.



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		The Company acknowledges that since it is the first instance of violation and considering the amount of contra trade was insignificant and that the trade was made inadvertently without intention of violating PIT Regulations or of making any undue gains to monetary penalty is levied												
7	Details of the previous instances of violations, if any, since last financial year	None												
8	If any amount collected for Code of Conduct violation(s) - <b>N.A.</b>													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)													
	ii. Details of transfer/payment in case of online: N.A.													
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <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> </tbody> </table>		Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (in Rs.)	
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9	Any other relevant information	-												

Yours faithfully,

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