

December 07, 2024

The Compliance Manager
BSE Limited
Corporate Relationship Dept.,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai 400001.

Scrip Code: **500655**

The Manager, Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Plot No. C/1, G Block,
Bandra-Kurla Complex,
Bandra (East), Mumbai 400 051.

Trading Symbol: **GRWRHITECH**

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

This is to inform you that in terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("the SEBI Regulations"), code of conduct of the Company and SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, we hereby submit the details in Annexure-A of this letter with regard to violation of Code of Conduct by Immediate relative of a Connected person.

Thanking you,

Yours faithfully,

For Garware Hi-Tech Films Limited

Awaneesh Srivastava
Company Secretary
FCS 8513

Encl.: As stated above

Annexure A

Report by Garware Hi-Tech Films 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	Garware Hi-Tech Films Limited
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed on BSE & NSE
3.	A. Details of Designated Person (DP)	
	i. Name of the DP	-
	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. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Mrs. Priti Mehta (Immediate relative of Connected person- ex employee)
	ii. PAN of the immediate relative of DP	AQRPM5779R
	C. Details of transaction(s)	
	i. Name of the scrip	500655 and GRWRHITECH

ii. No of shares traded and value (Rs.) (Date- wise)	Date of Sale	27-09-2024
	Qty	200
	Sale Average Rate	3406
	Sale Value	681200
	Sale Expenses	590.16
	Purchase Average Rate	3143.75
	Purchase Value	628749
	Purchase Expenses	625.65
	Purchase Index Cost	629374.65
	Profit/Loss (-)	51235.19
	* This statement is provided by Connected Person	
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	--	
ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	--	
4. Details of violations observed under Code of Conduct	<p>Violation of the Code of Conduct, Contra Trade executed by the immediate relative of the Connected Person.</p> <p>Mrs. Priti Mehta (Immediate Relative of Mr. Pradeep Mehta, who was ceased from the employment with effect from 14th August 2024) executed contra trade.</p>	
5. Action taken by Listed Company/ Intermediary/ Fiduciary	<p>The matter was placed before the Audit Committee in its meeting held on 14th November, 2024, the committee imposed a penalty of Rs. 50,000/- and the profit be disgorged. The penalty and profit be deposited to SEBI IPEF.</p>	

		<p>As stated, an amount of Rs 1,02,451/- has been deposited to SEBI – IPEF account by Mrs Priti Mehta.</p> <p>Further, Mrs. Mehta has also been warned to be extra cautious in future with regard to the Code of Conduct.</p>
6.	Reasons recorded in writing for taking action stated above	<p>The Connected person was CFO and Mrs. Mehta is immediate relative of Connected person.</p> <p>For Violation of Insider Trading Regulations and execution of contra trade by immediate relative thus imposed a penalty.</p>
7.	Details of the previous instances of violations, if any, since last financial year	N.A.
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: Yes	
	Particulars	Details
	Name of the Transferor	Mrs. Priti Mehta
	Bank Name, Branch and Account Number	-
	UTR/Transaction reference Number	241205210489454
	Transaction Date	05/12/2024
	Transaction Amount (in Rs.)	Rs. 1,02,451/-
	In Case of Demand Draft (DD) :	
	Particulars	Details
	Bank and Branch	N.A.
	DD Number	
	DD Date	
	DD Amount (in Rs.)	
9.	Any other relevant information	Nil