



## RAMA STEEL TUBES LTD.

Manufacturers & Exporters : ERW Steel Tubes (Black & Galvanised)

CIN : L27201DL1974PLC007114 | AN ISO 9001 : 2015 CO.

📍 Regd. Office : B-5, 3rd Floor, Main Road, Ghazipur, New Delhi (India) - 110096

☎ + (91)-(11)-43446600    ✉ info@ramasteel.com    🌐 www.ramasteel.com

**Date: November 21, 2024**

**To**

The Manager – Listing National Stock Exchange of India Limited, Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai – 400 051 <b>Symbol: RAMASTEEL</b>	The Secretary BSE Limited, Corporate Relationship Dept., P. J. Towers, Dalal Street, Mumbai - 400 001. <b>Scrip Code: 539309</b>
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**Dear Sir/Madam,**

**Sub.: Reporting for Code of Conduct to regulate, monitor and report trading by designated persons and their immediate relatives under SEBI (Prohibition of Insider Trading Regulations, 2015).**

This is to inform you that, pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“SEBI Regulations”), the Code of Conduct of Rama Steel Tubes Limited for regulating, monitoring, and reporting trading by designated persons and their immediate relatives (“the Code”), and SEBI Master Circular No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/039 dated March 23, 2023, the details of two instances where the Company has taken action against designated persons are enclosed as “Annexure A”.

Request you to kindly take the aforesaid information on your record.

**For Rama Steel Tubes Limited**

  
**Arpit Suri**  
**Company Secretary & Compliance Officer**  
**Email: [investors@ramasteel.com](mailto:investors@ramasteel.com)**



## Annexure A

**Report by Rama Steel Tubes Limited for violations related to Code of Conduct under SEBI  
(Prohibition of Insider Trading) Regulations, 2015**

Sr. No.	Particulars	Details
1.	Name of the listed company	Rama Steel Tubes Limited
2.	Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3.	<b>A. Details of Designated Person (DP)</b>	
	Name of the DP	Mr. Rakesh Chaturvedi
	PAN of the DP	AALPC5858R
	Designation of DP	President-Commercial
	Functional Role of DP	Marketing
	Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	Name of the immediate relative of DP	NA
	PAN of the immediate relative of DP	NA
	<b>C. Details of transaction(s)</b>	
	Name of the scrip	NSE- RAMASTEEL, BSE- 539309
	No of shares traded and value (₹) (Date- wise)	Buy 17,850 shares of Rs. 2,65,319/- and sold 16,000 shares of Rs. 2,28,025/-.
	<b>D. In case value of trade(s) is more than ₹10 lacs in a calendar quarter</b>	
	Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under Regulation 7 of SEBI (PIT) Regulations, 2015	NA
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA
4.	Details of violations observed under Code of Conduct	1.Pre-clearance approval was not sought for trading in the shares of the Company; 2.Non-submission of post trade intimation to the Company; 3.Contra Trade Violation.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Company has issued a Warning and caution letter to Mr. Rakesh Chaturvedi towards the violation of



		internal code of conduct of the company.
6.	Reasons recorded in writing for taking action stated above	The aforesaid action was taken considering the fact that it was Momentary lapse of awareness and was done for the very first time, without the possession of any UPSI and was non-material in nature. The designated person assured that the transaction was undertaken due to lack of awareness and would not be done in future.
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)	NA
9.	Mode of transfer to SEBI - IPEF (Online/Demand Draft)	NA
10.	Details of transfer/payment	NA
11.	Any other relevant information	NA





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Sr. No.	Particulars	Details
1.	Name of the listed company	Rama Steel Tubes Limited
2.	Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3.	<b>A. Details of Designated Person (DP)</b>	
	Name of the DP	Mr. Vineet Goel
	PAN of the DP	AFEPG7471G
	Designation of DP	Vice President –Sales & Marketing
	Functional Role of DP	Marketing
	Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	Name of the immediate relative of DP	NA
	PAN of the immediate relative of DP	NA
	<b>C. Details of transaction(s)</b>	
	Name of the scrip	NSE- RAMASTEEL, BSE- 539309
	No of shares traded and value (₹) (Date-wise)	Buy 10,000 shares of Rs. 1,18,500/- and sold 10,000 shares of Rs. 1,60,600/-.
	<b>D. In case value of trade(s) is more than ₹10 lacs in a calendar quarter</b>	
	Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under Regulation 7 of SEBI (PIT) Regulations, 2015	NA
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA
4.	Details of violations observed under Code of Conduct	1.Pre-clearance approval was not sought for trading in the shares of the Company; 2.Non-submission of post trade intimation to the Company; 3.Contra Trade Violation.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Company has issued a Warning and caution letter to Mr. Vineet Goel towards the violation of internal code of conduct of the company and directed to deposit



		the profit earned from the said trade into the SEBI IPEF account.												
6.	Reasons recorded in writing for taking action stated above	The aforesaid action was taken considering the fact that it was Momentary lapse of awareness and was done for the very first time, without the possession of any UPSI and was non-material in nature. The designated person assured that the transaction was undertaken due to lack of awareness and would not be done in future.												
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)	Rs. 33,680 (Amount collected net of taxes)												
9.	Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online												
10.	Details of transfer/payment	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Mr. Vineet Goel</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>Bank of India Branch: Bandra Kurla Complex (BKC) Account No.: 012210210000008</td> </tr> <tr> <td>UTR Number</td> <td>PUNBY24326914847</td> </tr> <tr> <td>Transaction Date</td> <td>21-11-2024</td> </tr> <tr> <td>Transaction Amount (in ₹)</td> <td>Rs. 33,680</td> </tr> </tbody> </table>	Particulars	Details	Name of the transferor	Mr. Vineet Goel	Bank Name, branch and Account number	Bank of India Branch: Bandra Kurla Complex (BKC) Account No.: 012210210000008	UTR Number	PUNBY24326914847	Transaction Date	21-11-2024	Transaction Amount (in ₹)	Rs. 33,680
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11.	Any other relevant information	NA												

