



Aryan Share & Stock Brokers Ltd

Member – NSE/BSE
Depository Participant : CDSL

Regd. Off: "Shreeji Metropolis"
No. 7, 7th Cross Street, 2nd Floor
Shenoy Nagar, Chennai – 600030.
Phone No : 26223360
Email : aryan@assbl.com
CIN : L65993TN1995PLC031800

Date: 12th January, 2024

The Manager,
BSE Limited,
PhirozeJeejeebhoy Towers
'A' wing,
Dalal Street, Fort,
Mumbai – 400021

Sub: Reporting to Stock Exchanges regarding violation under SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct (CoC)

Reference: Scrip Code -542176 ARYAN; ISIN - INE016X01010

Ref.: SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020

Dear Sir/Madam,


We refer to the captioned subject and enclose herewith the report by the Company for the violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the format of Annexure-A as prescribed by the SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Please take the same on record.

Thanking You,

Yours Truly,

For Aryan Share and Stock Brokers Ltd


Shanmukh Navin Shah
Managing Director
DIN: 00554879



Encl.: As Above



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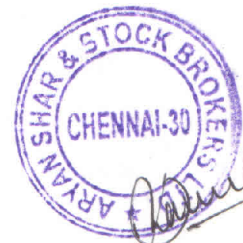
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Annexure - A

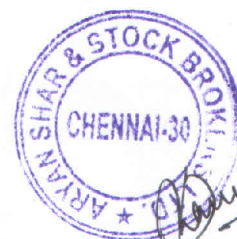
Report by Aryan Share & Stock Brokers Limited for violations related to Code of Conduct under SEBI(Prohibition of Insider Trading) Regulations, 2015.

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	Aryan Share & Stock Brokers Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Paresh Navin Shah
	ii. PAN of the DP	AMVPS9539H
	iii. Designation of DP	Whole-time Director
	iv. Functional Role of DP	He is doing Marketing in the Company
	v. Whether DP is Promoter or belongs to Promoter Group	Yes. DP belongs to the Promoter Group of the Company.
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	C. Details of transaction(s)	
	i. Name of the scrip	ARYAN SHARE AND STOCK BROKERS LIMITED BSE - 542176



	ii. No of shares traded and value(Rs.) (Date-wise)	Sold 2172 (Two thousand one hundred and seventy two) Equity shares @ Rs. 23.25/- per share, aggregating Rs. 50,499/- (Rupees Fifty thousand Four hundred and ninety nine only) on 03 rd January, 2024.
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 2172 equity shares of the Company during the trading window closure period. (Trading window was closed from 01 st January, 2024 till the completion of 48 hours after declaration of the Audited Financial Results for the quarter and year ended December 31, 2023)
5	Action taken by Listed company/Intermediary/Fiduciary	The Company by its email/letter to Mr. Paresh Navin Shah directed him to ensure that no further trading/contra-trading/dealing in shares of the Company till 31 st March, 2024 is done by him. Further, he has also been advised to strictly comply with the Insider Trading Regulations and the subject Code of Conduct of the Company and ensure that the same is not violated by him in future and also warned that any non-compliance would result in stringent disciplinary and monetary penalty action.



6	Reasons recorded in writing for taking action stated above	The DP is a part of the 'Promoter Group' of the Company and also the Whole-time Director. As submitted by him, the sale of shares by him during the period of closure of Trading Window was entirely inadvertent. He forgot the intimation of Trading Closure Window. However, the same is a violation in terms of the provisions of the SEBI(Prohibition of Insider Trading) Regulations, 2015 and considering all aspects including his submission that he inadvertently overlooked the closure of Trading window period and the sale at such time was unintentional and also the fact that it is the first case of violation, the Company has taken the aforesaid action.										
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)											
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Not Applicable										
	ii. Details of transfer/payment In case of Online: In case of Demand Draft (DD): N.A.											
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD amount (in Rs.)</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)		
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Bank Name and branch												
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9	Any other relevant information	Mr. Paresh Navin Shah has confirmed that the subject sold was an inadvertent trade made without intent to violate the Company's Insider Trading Policy or the SEBI (Prohibition of Insider Trading) Regulations, 2015.										

Yours faithfully,

Date: 12.01.2024

Place: Chennai

For Aryan Share and Stock Brokers Limited



Shanmukh Navin Shah
Shanmukh Navin Shah
Managing Director
DIN: 00554879