

GREENLAM/2020-21  
November 03, 2020

The Manager,  
**BSE Limited**  
Department of Corporate Services  
Floor 25, P.J. Towers, Dalal Street  
Mumbai - 400 001  
Fax No. 022-2272-3121/1278/1557/3354  
Email: [corp.relations@bseindia.com](mailto:corp.relations@bseindia.com)

The Manager,  
**National Stock Exchange of India Ltd.**  
Exchange Plaza, BandraKurla Complex,  
Bandra (E)  
Mumbai - 400 051  
Fax No. 022-2659-8237/8238/8347/8348  
Email: [cmlist@nse.co.in](mailto:cmlist@nse.co.in)

BSE Scrip Code: **538979**

NSE Symbol: **GREENLAM**

**Subject - Reporting of Violations of Code of Conduct for Prohibition of Insider Trading**

**Ref: SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020**

Dear Sir/ Madam,

We would like to inform that one of the Designated Persons of Greenlam Industries Limited ('the Company'), defined under the Code of Conduct for Prohibition of Insider Trading ("Code") as adopted by the Company, have traded in the equity shares of the Company in violations of the Code read with SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations").

In compliance with SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, a report for the aforesaid violation by the Designated Person is annexed as Annexure 'A'.

Kindly take the above information on record.

Thanking You,  
Yours faithfully,

For **GREENLAM INDUSTRIES LIMITED**



**PRAKASH KUMAR BISWAL**  
**COMPANY SECRETARY &**  
**VICE PRESIDENT - LEGAL**



Encl. As above

Annexure A

Reporting of violations of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr. No.	Particulars	Details
1.	Name of the listed company/ Intermediary/Fiduciary	GREENLAM INDUSTRIES 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.	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr. BL Sharma
	ii. PAN of the DP	ACHPS5172L
	iii. Designation of DP	President
	iv. Functional Role of DP	Head of Manufacturing
	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	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	NSE Symbol - GREENLAM BSE Scrip Code - 538979
	ii. No. of shares traded and value (Rs.) (Date - wise)	As per the sheet annexed as Annexure B containing the details of trades in violation of Code
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	October 15, 2020
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	October 16, 2020



4.	Details of violations observed under Code of Conduct	<ol style="list-style-type: none"> <li>1. Trading in securities of the Company which is in excess of the threshold (i.e. 2000 in number or Rs. 10 lacs in value, whichever is lower, in a month) without taking pre-clearance for such trades from the Compliance Officer;</li> <li>2. Non-intimation of the execution of the trade under Para 12 of the Code of Conduct for Prohibition of Insider Trading ("Code") read with Regulation 7 of the PIT Regulations;</li> <li>3. Executing contra trades within the time frame of 6 months which is prohibited under the Code of the Company; and</li> <li>4. Execution of trades during the closure of trading window.</li> </ol>
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Audit Committee of the Company in consultation with the Stakeholders' Relationship Committee and Managing Director of the Company advised to issue a warning letter to Mr. BL Sharma to strictly adhere to the provisions of the Code of the Company and also to remain diligent and be in complete compliance of the Code henceforth to avoid stringent actions for any subsequent violation.
6.	Reasons recorded in writing for taking action stated above	Mr. BL Sharma had admitted that the trades executed by him in violation of the Code read with SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations") were unintentional and solely because of ignorance without any malafide intent and his failure in understanding the nitty-gritty of the framework of the Code.
7.	Details of the previous instances of violations, if any, since last financial year	First-time identification of violation of the Code and the PIT Regulations.
8.	If any amount collected for Code of Conduct violation(s)	The amount of profits of Rs. 2,64,515.09/- earned by him due to contra trading have been transferred to IPEF.




i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online												
ii. Details of transfer/payment  In case of Online: <table border="1" data-bbox="193 450 1107 696"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Mr. BL Sharma</td> </tr> <tr> <td>Bank Name, branch and Account Number</td> <td>ICICI Bank,</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>0000955577950</td> </tr> <tr> <td>Transaction date</td> <td>14.10.2020</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>Rs. 264515.09/-</td> </tr> </tbody> </table>		Particulars	Details	Name of the transferor	Mr. BL Sharma	Bank Name, branch and Account Number	ICICI Bank,	UTR/Transaction reference Number	0000955577950	Transaction date	14.10.2020	Transaction Amount (in Rs.)	Rs. 264515.09/-
Particulars	Details												
Name of the transferor	Mr. BL Sharma												
Bank Name, branch and Account Number	ICICI Bank,												
UTR/Transaction reference Number	0000955577950												
Transaction date	14.10.2020												
Transaction Amount (in Rs.)	Rs. 264515.09/-												
9. Any other relevant information	None												

Yours faithfully,  
For **GREENLAM INDUSTRIES LIMITED**

Date: November 03, 2020  
Place: New Delhi




**PRAKASH KUMAR BISWAL**  
COMPANY SECRETARY & COMPLAINEE OFFICER

PAN: AJZPB0247L  
Email ID: [prakash.biswal@greenlam.com](mailto:prakash.biswal@greenlam.com)

**Annexure B**

Date of Trading	No. of shares traded	Value (in Rs.)	Type of Violation
24.10.2019	100	87,704.76	Sold shares during closure of trading window
26.03.2020	521	272,678.16	Executed contra trades
31.03.2020	521	259,115.33	Executed contra trades
29.06.2020	1000	766,363.68	Executed contra trades
02.09.2020	650	489,755.82	Executed contra trades
03.09.2020	28	20,370.57	Executed contra trades
04.09.2020	572	415,830.13	Executed contra trades
07.09.2020	418	299,808.82	Executed contra trades
08.09.2020	291	207,258.93	Executed contra trades
09.09.2020	2003	1,406,494.95	Executed contra trades
10.09.2020	1508	1,074,034.09	Executed contra trades
14.09.2020	292	210,458.72	Executed contra trades
22.09.2020	27	19,338.51	Executed contra trades

Yours faithfully,  
For GREENLAM INDUSTRIES LIMITED

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