

Date: 17.05.2021

To,
Dept. of Corporate Services,
BSE Ltd.
25th Floor, Phiroze Jeejeebhoy Tower,
Dalal Street, Fort,
Mumbai – 400 001

To,
Listing Department,
National Stock Exchange of India Ltd.
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex,
Bandra (E) Mumbai - 400 051

Scrip Code: 539725

Symbol: GOKULAGRO

Sub: Inadvertent trade in equity shares of the Gokul Agro Resources Limited by the designated person, during period of closure of Trading Window.

Dear Sir / Madam,

This is in reference to our letter dated March 31, 2021 inter-alia intimating about closure of trading window for dealing in securities of Gokul Agro Resources Limited [GARL] from April 01, 2021 till 48 hours after the declaration of the financial results for the quarter and year ended on March 31, 2021; in line with the SEBI (Prohibition of Insider Trading Regulations), 2015 [SEBI PIT Regulations] and GARL Code of Conduct Insider Trading.

In this regard, Mr. Dipakkumar Harwani, General Manager-Marketing of the Company, vide his letter dated April 25, 2021 (enclosed as Annexure I) informed that he has inadvertently purchased 50 Equity Shares of GARL on April 23, 2021 during the trading window closure period. Mr. Dipak Harwani has conveyed that at the time of entering into transaction he was home isolated due to infection of some disease. Further, he clarified that he purchased the equity shares of few companies including GARL Shares from his own resources, without having the knowledge about closure of trading window. Further, he has informed that he was not in possession of any Unpublished Price Sensitive Information [UPSI] and the said trade was carried out inadvertently without any intentions of reaping abnormal gains.

The matter was deliberated at the Meeting of the Audit Committee held on May 17, 2021. The Board noted that Mr. Dipak Harwani was not in possession of any UPSI and the fact that he is not a member of Board and other committees, and is also not involved into accounts and finance functions of the Company. Therefore, it was concluded that this was inadvertent trade made by Mr. Dipak Harwani, without any intention to violate SEBI PIT Regulations and Company's Code of Conduct for Insider Trading formulated in this regard. It was also noted that this was the first case of violation by Mr. Harwani.

However, it was concluded that there has been a violation of SEBI PIT Regulations and Code of Conduct of the Company, and therefore, a penalty for inadvertent trade during the period of Closure of Trading Window should be imposed. As decided, Mr. Dipak Harwani has been asked to dispose off the said 50 Equity Shares of GARL through stock market mechanism within the period of 7 days after UPSI is made public. Further, the profit, if any, arising out of such disposition of shares shall be remitted to GARL, for onward remittance to SEBI (Investor

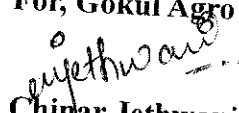
Protection and Education Fund). It is also decided to warn Mr. Harwani stating that any recurrence of such violation would lead to a harsher penalty.

In this regard, the disclosure as prescribed vide SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 is enclosed herewith as Annexure A. The details of transfer of funds to SEBI (Investor Education and Protection Fund) will be furnished, once the shares will be disposed by Mr. Dipak Harwani and the profit earned if any, on the transaction, transferred to the Company.

Hope you find the above in order and take the same in your records.

Thanking you.

For, Gokul Agro Resources Limited


Chinara Jethwani
Company Secretary and Compliance Officer



Date: April 25, 2021

To,
The Compliance Officer
Gokul Agro Resources Limited
Ahmedabad

Sub: Inadvertent purchase of Equity Shares of Gokul Agro Resources Limited

Dear Ma'am,

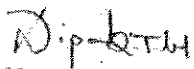
This is to inform you that I have inadvertently purchased 50 Equity Shares of Gokul Agro Resources Limited on April 23, 2021 i.e. during the closure of trading window period. My DP Statement is enclosed herewith for your information and records.

I would like to confirm that at the time of transaction I was not in possession of any Unpublished Price Sensitive Information. Hence, this transaction was made for the investment purpose and was inadvertently made without any intentions of any abnormal gains nor the transaction was backed by any unpublished price sensitive information. I assure you that such kind of violation of SEBI PIT Regulations and Company's policy will not happen in future.

Hope you find the above in order.

Thanking You,

Yours Faithfully,



Dipak Harwani
General Manager- Marketing
Gokul Agro Resources Limited

Report by Gokul Agro Resources Limited for violations related to Code of Conduct
under SEBI (Prohibition of Insider Trading) Regulations, 2015.

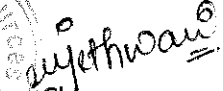
As per Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading)
Regulations, 2015

Sr no.	Particulars	Details						
1	Name of the listed company ✓ / Intermediary/Fiduciary	Gokul Agro Resources 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 Company						
A. Details of Designated Person (DP)								
	i. Name of the DP	Mr. Dipak Harwani						
	ii PAN of the DP	ACOPH5494H						
	iii Designation of DP	General Manager- Marketing						
	iv Functional Role of DP	Mr. Dipak Harwani is General Manager – Marketing of the Company and is only involved in the Marketing functions, and not any other administrative or management functions of the Company.						
	v Whether DP is Promoter or belongs to Promoter Group	No						
B. If Reporting is for immediate relative of DP								
	i. Name of the immediate relative of DP	N.A.						
	ii PAN of the immediate relative of DP	N.A.						
C. Details of transaction(s)								
	i Name of the scrip	Gokul Agro Resources Limited Scrip Code: 539725(BSE) and GOKULAGRO (NSE)						
	ii No of shares traded and value (Rs.) (Date- wise)	<table border="1"> <thead> <tr> <th>Date</th> <th>No.s of Shares</th> <th>Value(Rs.)</th> </tr> </thead> <tbody> <tr> <td>April 23, 2021</td> <td>50</td> <td>1067.50</td> </tr> </tbody> </table>	Date	No.s of Shares	Value(Rs.)	April 23, 2021	50	1067.50
Date	No.s of Shares	Value(Rs.)						
April 23, 2021	50	1067.50						

D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter		
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	N.A.
	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	Purchase of 50 Equity Shares of Gokul Agro Resources Limited during the period of Closure of Trading Window.
5	Action taken by Company	<p>As a penalty for inadvertent trade during the period of Closure of Trading Window, Mr. Dipak Harwani has been asked to dispose off the said 50 Equity Shares of GARL through stock market mechanism within the period of 7 days after UPSI is made public.</p> <p>Further, the profit, if any, arising out of such disposition of shares shall be remitted to GARL, for onward remittance to SEBI (Investor Protection and Education Fund).</p>
6	Reasons recorded in writing for taking action stated above	Mr. Dipak Harwani has conveyed in his letter dated April 25, 2021 that at the time of entering into the transaction, he was under 'Home Quarantine' due to infection of some disease. Further, due to oversight, he purchased Equity Shares of GARL from his own resources without having realized that the Trading Window for shares is closed.

		Mr. Dipak Harwani has declared that at the time of entering into the transaction, he was not in possession of any Unpublished Price Sensitive Information and the said trade was carried out inadvertently without any intent of reaping abnormal gains.
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)	Details will be intimated separately.
	(i) Mode of transfer to SEBI- IPEF (Online/Demand Draft)	
	(ii) Details of transfer/payment	

Date: 17.05.2021
Place: Ahmedabad

Yours Faithfully
For Gokul Agro Resources Limited

Chinara Jethwani
Company Secretary and Compliance Officer