

BHARAT FORGE

February 22, 2021

To,

BSE Limited,

1st Floor, New Trading Ring,
Rotunda Building, P.J. Towers,
Dalal Street, Fort,
Mumbai - 400 001

BSE SCRIP CODE – 500493

**National Stock Exchange of India
Ltd.,**

'Exchange Plaza',
Bandra-Kurla Complex, Bandra (East)
Mumbai- 400 051

Symbol: **BHARATFORG**

Series: **EQ**

Dear Sir/Madam,

**Sub:Reporting of violations under the Code of Conduct for Insider Trading and Fair
Disclosure of Unpublished Price Sensitive Information of the Company**

Ref: SEBI/HO/ISD/ISD/CIR/P/2020/135 circular dated July 23, 2020

With reference to the above, please find enclosed herewith report on violations under the Code of Conduct for Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information of the Company by the Designated Persons and/or their immediate relatives.

This is for your information.

Thanking you,

Yours faithfully,

For **Bharat Forge Limited**



Tejaswini Chaudhari
Company Secretary



KALYANI
GROUP COMPANY

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Reporting on Insider Trading violation under Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

SN	Particulars	Details									
1.	Name of the listed company/ Intermediary/Fiduciary	Bharat Forge Limited									
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary										
3.	A. Details of Designated Person (DP)										
	i. Name of the DP	Ajit Palande									
	ii. PAN of the DP	ABQPP4100R									
	iii. Designation of DP	Senior Manager- Production, Planning and Control									
	iv. Functional Role of DP	Process and production planning									
	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	NA									
	ii. PAN of the immediate relative of DP	NA									
	C. Details of transaction(s)										
	i. Name of the scrip	Bharat Forge Limited BSE- 500493 NSE- BHARATFORG									
	ii. No of shares traded and value (Rs.) (Date- wise)	Sold shares as follows: <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr> <th>Date</th> <th>Qty</th> <th>Value</th> </tr> </thead> <tbody> <tr> <td>13-Jan-2021</td> <td>30</td> <td>645.00</td> </tr> <tr> <td>13-Jan-2021</td> <td>15</td> <td>614.00</td> </tr> </tbody> </table>	Date	Qty	Value	13-Jan-2021	30	645.00	13-Jan-2021	15	614.00
Date	Qty	Value									
13-Jan-2021	30	645.00									
13-Jan-2021	15	614.00									
	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	NA									
	ii. 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	DP traded during the trading window closure period (Trading window was closed from January 1, 2021 to February 14, 2021).									
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Company took the following actions:									

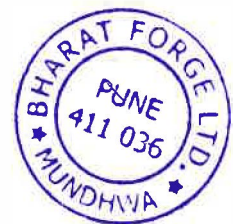


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		a. Sought explanation in writing for the said violation; and b. Issued warning against any future violation.																						
6.	Reasons recorded in writing for taking action stated above	Warning issued considering the amount involved and the fact that this was a first time violation by the DP.																						
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)	None																						
	ii. Details of transfer/ payment In case of online: NA <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Particulars</th> <th style="width: 60%;">Details</th> </tr> </thead> <tbody> <tr> <td>Name of transferor</td> <td style="text-align: center;">-</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td style="text-align: center;">-</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td style="text-align: center;">-</td> </tr> <tr> <td>Transaction Date</td> <td style="text-align: center;">-</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td style="text-align: center;">-</td> </tr> </tbody> </table> In case of Demand Draft (DD): NA <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Particulars</th> <th style="width: 60%;">Details</th> </tr> </thead> <tbody> <tr> <td>Bank name and branch</td> <td style="text-align: center;">-</td> </tr> <tr> <td>DD Number</td> <td style="text-align: center;">-</td> </tr> <tr> <td>DD Date</td> <td style="text-align: center;">-</td> </tr> <tr> <td>DD Amount (in Rs.)</td> <td style="text-align: center;">-</td> </tr> </tbody> </table>		Particulars	Details	Name of transferor	-	Bank Name, branch and Account number	-	UTR/Transaction reference Number	-	Transaction Date	-	Transaction Amount (in Rs.)	-	Particulars	Details	Bank name and branch	-	DD Number	-	DD Date	-	DD Amount (in Rs.)	-
Particulars	Details																							
Name of transferor	-																							
Bank Name, branch and Account number	-																							
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Transaction Date	-																							
Transaction Amount (in Rs.)	-																							
Particulars	Details																							
Bank name and branch	-																							
DD Number	-																							
DD Date	-																							
DD Amount (in Rs.)	-																							
9.	Any other relevant information	None																						

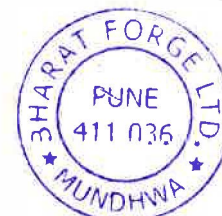


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Reporting on Insider Trading violation under Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

SN	Particulars	Details						
1.	Name of the listed company/ Intermediary/Fiduciary	Bharat Forge Limited						
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary							
3.	A. Details of Designated Person (DP)							
	vi. Name of the DP	Ashwin Mahajan						
	vii. PAN of the DP	AATPM1676M						
	viii. Designation of DP	Vice President- Machined Component Division (MCD-I)						
	ix. Functional Role of DP	Heading all the activities of MCD-I						
	x. 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	Swati Mahajan (Spouse of DP)						
	ii. PAN of the immediate relative of DP	ASFPM4581P						
	C. Details of transaction(s)							
	i. Name of the scrip	Bharat Forge Limited BSE- 500493 NSE- BHARATFORG						
	ii. No of shares traded and value (Rs.) (Date- wise)	Bought shares as follows: <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Date</th> <th style="text-align: center;">Qty</th> <th style="text-align: center;">Value (per share)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">18-Jan-2021</td> <td style="text-align: center;">2</td> <td style="text-align: center;">597.08</td> </tr> </tbody> </table>	Date	Qty	Value (per share)	18-Jan-2021	2	597.08
Date	Qty	Value (per share)						
18-Jan-2021	2	597.08						
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter							
	iii. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA						
	iv. 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	Immediate relative of DP traded during the trading window closure period (Trading window was closed from January 1, 2021 to February 14, 2021).						



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5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Company took the following actions: a. Sought explanation in writing for the said violation; and b. Issued warning against any future violation.												
6.	Reasons recorded in writing for taking action stated above	Warning issued considering the amount involved and the fact that this was a first time violation by the DP.												
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)	None												
	ii. Details of transfer/ payment													
	In case of online: NA													
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Particulars</th> <th style="width: 60%;">Details</th> </tr> </thead> <tbody> <tr> <td>Name of transferor</td> <td style="text-align: center;">-</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td style="text-align: center;">-</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td style="text-align: center;">-</td> </tr> <tr> <td>Transaction Date</td> <td style="text-align: center;">-</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td style="text-align: center;">-</td> </tr> </tbody> </table>		Particulars	Details	Name of transferor	-	Bank Name, branch and Account number	-	UTR/Transaction reference Number	-	Transaction Date	-	Transaction Amount (in Rs.)	-
Particulars	Details													
Name of transferor	-													
Bank Name, branch and Account number	-													
UTR/Transaction reference Number	-													
Transaction Date	-													
Transaction Amount (in Rs.)	-													
	In case of Demand Draft (DD): NA													
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Particulars</th> <th style="width: 60%;">Details</th> </tr> </thead> <tbody> <tr> <td>Bank name and branch</td> <td style="text-align: center;">-</td> </tr> <tr> <td>DD Number</td> <td style="text-align: center;">-</td> </tr> <tr> <td>DD Date</td> <td style="text-align: center;">-</td> </tr> <tr> <td>DD Amount (in Rs.)</td> <td style="text-align: center;">-</td> </tr> </tbody> </table>		Particulars	Details	Bank name and branch	-	DD Number	-	DD Date	-	DD Amount (in Rs.)	-		
Particulars	Details													
Bank name and branch	-													
DD Number	-													
DD Date	-													
DD Amount (in Rs.)	-													
9.	Any other relevant information	None												



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Reporting on Insider Trading violation under Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

SN	Particulars	Details												
1.	Name of the listed company/ Intermediary/Fiduciary	Bharat Forge Limited												
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary													
3.	A. Details of Designated Person (DP)													
	xi. Name of the DP	Sasi Ramkrishnan P												
	xii. PAN of the DP	AAPPP0572K												
	xiii. Designation of DP	Associate Vice President, Strategic Business												
	xiv. Functional Role of DP	Handling engineering functions of CLWT (Centre for Light Weight Technology)												
	xv. 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	Shinu Sasi (Spouse of DP)												
	ii. PAN of the immediate relative of DP	CXRPP9312G												
	C. Details of transaction(s)													
	i. Name of the scrip	Bharat Forge Limited BSE- 500493 NSE- BHARATFORG												
	ii. No of shares traded and value (Rs.) (Date- wise)	Bought and sold shares as follows: <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr> <th>Nature</th> <th>Date</th> <th>Qty</th> <th>Value per share</th> </tr> </thead> <tbody> <tr> <td>Buy</td> <td>29-Dec-2020</td> <td>100</td> <td>521.90</td> </tr> <tr> <td>Sold</td> <td>1-Jan-2021</td> <td>100</td> <td>528.00</td> </tr> </tbody> </table>	Nature	Date	Qty	Value per share	Buy	29-Dec-2020	100	521.90	Sold	1-Jan-2021	100	528.00
Nature	Date	Qty	Value per share											
Buy	29-Dec-2020	100	521.90											
Sold	1-Jan-2021	100	528.00											
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter													
	v. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA												
	vi. 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	a. Immediate relative of DP traded during the trading window closure period (Trading window was closed from January 1,												



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BHARAT FORGE LIMITED, MUNDHWA, PUNE 411 036, MAHARASHTRA, INDIA.
PHONE : +91 20 6704 2777 FAX : +91 20 2682 0699 (Export), 2682 2387 (Sales/Mktg) 2682 2163 (Materials)
Website : www.bharatforge.com
CIN No. L25209PN1961PLC012046



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		2021 to February 14, 2021); and b. Immediate relative executed contra trade												
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Company took the following actions: a. Sought explanation in writing for the said violation; b. Issued warning against any future violation; and c. Instructed to disgorge profit accrued through the transactions amounting to Rs. 1,210/- plus penalty of Rs.500/-.												
6.	Reasons recorded in writing for taking action stated above	The Company took aforesaid actions considering the following: a. Quantity traded being marginal; b. DP did not possess any UPSI at the time of trade; c. First time violation by the DP/ immediate relative.												
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)	Remitted online												
	ii. Details of transfer/ payment In case of online: <table border="1" style="margin-left: 20px; border-collapse: collapse; width: 80%;"> <thead> <tr> <th style="text-align: left;">Particulars</th> <th style="text-align: left;">Details</th> </tr> </thead> <tbody> <tr> <td>Name of transferor</td> <td>Sasi R Puthanpurayil</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>ICICI-BANK, Shivajinagar Branch, Pune 003901062900</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>104917526545</td> </tr> <tr> <td>Transaction Date</td> <td>18-02-2021</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>1,710/-</td> </tr> </tbody> </table>		Particulars	Details	Name of transferor	Sasi R Puthanpurayil	Bank Name, branch and Account number	ICICI-BANK, Shivajinagar Branch, Pune 003901062900	UTR/Transaction reference Number	104917526545	Transaction Date	18-02-2021	Transaction Amount (in Rs.)	1,710/-
Particulars	Details													
Name of transferor	Sasi R Puthanpurayil													
Bank Name, branch and Account number	ICICI-BANK, Shivajinagar Branch, Pune 003901062900													
UTR/Transaction reference Number	104917526545													
Transaction Date	18-02-2021													
Transaction Amount (in Rs.)	1,710/-													



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In case of Demand Draft (DD): NA		
Particulars	Details	
Bank name and branch	-	
DD Number	-	
DD Date	-	
DD Amount (in Rs.)	-	
9.	Any other relevant information	None



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Reporting on Insider Trading violation under Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

SN	Particulars	Details
1.	Name of the listed company/ Intermediary/Fiduciary	Bharat Forge Limited
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3.	A. Details of Designated Person (DP)	
	xvi. Name of the DP	Sivasankaran M
	xvii. PAN of the DP	AJNPS5586K
	xviii. Designation of DP	Retainer
	xix. Functional Role of DP	Handling all secretarial and admin work related to Closed Die Forge Division Department
	xx. 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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	Bharat Forge Limited BSE- 500493 NSE- BHARATFORG
	ii. No of shares traded and value (Rs.) (Date- wise)	Bought and sold shares as per Annexure A
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	vii. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	February 17, 2021
	viii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	February 17, 2021 to BSE February 18, 2021 to NSE
4.	Details of violations observed under Code of Conduct	a. DP traded during the trading window closure period (Trading window was closed from January 1, 2021 to February 14, 2021); b. DP executed contra-trade; c. DP executed trade in excess of Rs. 10 lakh in a calendar quarter without



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		obtaining pre-clearance; and d. DP failed to make requisite disclosures to the Company within a period of two trading days of the transaction/s.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Company took the following actions: a. Sought explanation in writing for the said violation; b. Issued warning against any future violation; c. Banned DP from engaging in any trade of the securities of the Company for a period of 1 year from the date of issue of notice by the Company; and d. Instructed to disgorge profit accrued through the transactions amounting to Rs. 29,176/- plus penalty of Rs.10,000/-.
6.	Reasons recorded in writing for taking action stated above	The Company took aforesaid actions considering the following: a. DP informed that he has traded inadvertently during trading window closure period without obtaining preclearance of trade. b. DP did not possess any UPSI at the time of trade c. First time violation by the DP
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)	Remitted online



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ii. Details of transfer/ payment

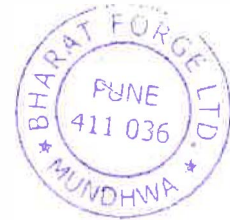
In case of online:

Particulars	Details
Name of transferor	SIVASANKARAN K M
Bank Name, branch and Account number	ICICI Bank, Shangrila Garden Branch 000501034167
UTR/Transaction reference Number	47696941
Transaction Date	18-02-2021
Transaction Amount (in Rs.)	39,176.00

In case of Demand Draft (DD): NA

Particulars	Details
Bank name and branch	-
DD Number	-
DD Date	-
DD Amount (in Rs.)	-

9.	Any other relevant information	None
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Annexure A:

Details of shares traded by Mr. Sivasankaran M as required under Point 3(c)(ii):

Date	Nature	Qty	Value per share
27-Jan-2021	Bought	200	592.82
25-Jan-2021	Bought	300	600.60
21-Jan-2021	Sold	400	633.96
14-Jan-2021	Bought	100	619.80
13-Jan-2021	Sold	200	646.21
13-Jan-2021	Sold	100	646.19
13-Jan-2021	Bought	300	622.38
11-Jan-2021	Bought	100	609.69
08-Jan-2021	Bought	100	605.06
08-Jan-2021	Bought	100	603.80
04-Jan-2021	Sold	140	551.60



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