



RACL Geartech Ltd.

Corporate Office

B-9, Sector-3, Noida, Uttar Pradesh-201301, INDIA

Phone: +91-120-4588500 Fax: +91-120-4588513

Web: www.raclgeartech.com E-mail: info@raclgeartech.com

20th February, 2021

REF. NO. RACL/ BSE/ 2020-21

**The Manager - Listing
BSE Limited**

25th Floor, P. J. Towers,
Dalal Street,
Mumbai - 400 001

Scrip Code: 520073

Subject: Disclosure under Regulation 9 of SEBI (Prohibition of Insider Trading) Regulation, 2015

Dear Sir/Madam,

Pursuant to Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015, please find enclosed herewith **Annexure A** as stipulated in the said Regulations.

You are requested to kindly take the same on record and oblige.

For RACL Geartech Limited


Shagun Bajpai
Company Secretary & Compliance Officer



Registered Office

15th Floor, Eros Corporate Tower, Nehru Place, New Delhi-110019, INDIA

Phone: +91-11-66155129

CIN: L34300DL1983PLC016136

D-U-N-S Number: 65-013-7086



TS 16949 : 2009
TS 518901 - 000

Annexure A

Report by RACL Geartech 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	RACL Geartech Limited			
2.	Reporting in capacity of	Listed Company			
3.	A. Details of Designated Person(DP)				
	i. Name of the DP	Mr. Dev Raj Arya			
	ii. PAN of the DP	AACPA3671R			
	iii. Designation of DP	Promoter			
	iv. Functional Role of DP				
	v. Whether DP is Promoter or belongs to Promoter Group	Yes			
	B. If Reporting is for immediate relative of DP	No			
	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	BSE: 520073			
	ii. No of shares traded and value (Rs.) (Date- wise)	12-03-2020	Purchase	900 Shares	Rs. 62714.50
		13-03-2020	Sale	900 Shares	Rs. 67500.00
		20-03-2020	Sale	2000 Shares	Rs. 118000.00
		23-03-2020	Purchase	2000 Shares	Rs. 106777.60
		07-09-2020	Sale	592 Shares	Rs. 62160.00
		30-09-2020	Sale	885 Shares	Rs. 102394.50
		12-12-2020	Purchase	349 Shares	Rs. 48860.00
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter: No				
	Date of intimation of trade(s) to Company under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable			
	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	Executed Contra Trade within six month time frame.			
5.	Action taken by Listed Company	Issued Warning letter to take utmost care and has been directed to transfer the profits arising out of contra trade to SEBI-IEPF Account			
6.	Reasons recorded in writing for taking action stated above	In consonance with Company's Code of Conduct			
7.	Details of the previous instances of violations, if any, since last financial year	-			
8.	Any amount collected for Code of Conduct violation(s)				
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Demand Draft			
	ii. Details of transfer/payment				

In case of Online:	
Particulars	Details
Name	Dev Raj Arya
Bank Name and branch	Axis Bank, Sector 27, Noida, Uttar Pradesh
DD Number	77
DD date	17.02.2021
DD Amount (in Rs.)	Rs. 38081.00
9	Any other relevant information
	None

Yours faithfully,

Date: 20th February, 2021

Place: Noida

Shagun Bajpai




Shagun Bajpai
Company Secretary & Compliance Officer
 PAN: CBGPB8233B
 Email ID: shagun@rajgeartech.com

Annexure A

**Report by RACL Geartech 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	RACL Geartech Limited			
2.	Reporting in capacity of	Listed Company			
3.	A. Details of Designated Person(DP)				
	i. Name of the DP				
	ii. PAN of the DP				
	iii. Designation of DP				
	iv. Functional Role of DP				
	v. Whether DP is Promoter or belongs to Promoter Group				
	B. If Reporting is for immediate relative of DP	Yes			
	i. Name of the immediate relative of DP	Mrs. Raj Arya			
	ii. PAN of the immediate relative of DP	ABVPA0804A			
	C. Details of transaction(s)				
	i. Name of the scrip	BSE: 520073			
	ii. No of shares traded and value (Rs.) (Date- wise)	31-12-2019	Sale	410 Shares	Rs. 47150.00
		25-02-2020	Purchase	1620 Shares	Rs. 175198.95
		19-03-2020	Purchase	4000 Shares	Rs. 205985.00
		19-03-2020	Sale	4000 Shares	Rs. 221831.60
		23-03-2020	Purchase	211 Shares	Rs. 11214.65
		13-08-2020	Sale	1000 Shares	Rs. 77300.00
		28-08-2020	Sale	2000 Shares	Rs. 218000.00
		11-12-2020	Purchase	70 Shares	Rs. 9415.00
	D. In case value of trade(s) is more than Rs.10 Lacs in a calendar quarter: Yes				
	Date of intimation of trade(s) to Company under regulation 7 of SEBI (PIT) Regulations, 2015	22-12-2020			
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	23-12-2020			
4.	Details of violations observed under Code of Conduct	Executed Contra Trade within six month time frame. Non-Disclosure of trade whose value was above Rs. 10 Lakh in a Calendar Quarter			
5.	Action taken by Listed Company	Issued Warning Letter to take utmost care and has been directed to transfer the profits arising out of contra trade to SEBI-IPEPF Account.			
6.	Reasons recorded in writing for taking action stated above	In consonance with Company's Code of Conduct			
7.	Details of the previous instances of violations, if any, since last financial year	-			
8.	Any amount collected for Code of Conduct violation(s)				
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Demand Draft			

ii. Details of transfer/payment In case of Online:	
Particulars	Details
Name	Raj Arya
Bank Name and branch	Axis Bank, Sector 27, Noida, Uttar Pradesh
DD Number	76
DD date	17.02.2021
DD Amount (in Rs.)	Rs. 23651.00
9	Any other relevant information
	None

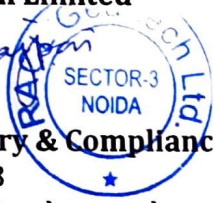
Yours faithfully,

Date: 20th February, 2021

Place: Noida

For RA CL Geartech Limited

Shagun Bajpai
Shagun Bajpai
Company Secretary & Compliance Officer
 PAN: CBGPB8233B
 Email ID: shagun@raclgeartech.com



Annexure A

**Report by RACL Geartech 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	RACL Geartech Limited
2.	Reporting in capacity of	Listed Company
3.	A. Details of Designated Person(DP)	
	i. Name of the DP	Prabh Mehar Singh
	ii. PAN of the DP	CKMPS6495P
	iii. Designation of DP	Vice President- F&A
	iv. Functional Role of DP	
	v. Whether DP is Promoter or belongs to Promoter Group	Yes
	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	BSE: 520073
	ii. No of shares traded and value (Rs.) (Date- wise)	2500 Shares purchased and sold between September, 2020 and December, 2020.
	D. In case value of trade(s) is more than Rs.10 Lacs in a calendar quarter: No	
	Date of intimation of trade(s) to Company under regulation 7 of SEBI (PIT) Regulations, 2015	N.A.
	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	Executed Contra Trade within six month time frame.
5.	Action taken by Listed Company	Issued Warning Letter to take utmost care and has been directed to transfer the profits arising out of contra trade to SEBI-IEPF Account, if any.
6.	Reasons recorded in writing for taking action stated above	In consonance with Company's Code of Conduct
7.	Details of the previous instances of violations, if any, since last financial year	-
8.	Any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	
	ii. Details of transfer/payment In case of Online:	
	Particulars	Details
	Name	
	Bank Name and branch	
	DD Number	

	DD date		
	DD Amount (in Rs.)		
9	Any other relevant information	The matter is under investigation.	

Yours faithfully,

Date: 20th February, 2021

Place: Noida

For RACL Geartech Limited



Shagun Bajpai
Company Secretary & Compliance Officer
PAN: CBGPB8233B
Email ID: shagun@raclgeartech.com