

**HFFCIL/BSE/NSE/EQ/56/2022-23**

**Date: 19-07-2022**

To, <b>BSE Limited,</b> Department of Corporate Services, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001. Scrip Code- <b>543259</b>	To, <b>The National Stock Exchange of India Limited,</b> The Listing Department, Bandra Kurla Complex, Mumbai- 400 051. Scrip Symbol- <b>HOMEFIRST</b>
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**Subject: Reporting of violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

Dear Sir/Madam,

In terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code of Conduct for Prevention of Insider Trading adopted by Home First Finance Company India Limited (“the Company”), we are submitting the report on intimation and action taken by the Company, for violations of Code of Conduct and the SEBI Regulations read with SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

We would like to submit that the reported violation is not material in relation to the total paid up equity share capital of the Company.

This is for your information and records.

Thanking you,

**For Home First Finance Company India Limited**

**Shreyans Bachhawat**  
**Company Secretary and Compliance Officer**  
**ACS NO: 26700**

**Report by Home First Finance Company India 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/ Intermediary/Fiduciary	Home First Finance Company India Limited
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input type="checkbox"/> Listed Company:✓ <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed on BSE Ltd. and The National Stock Exchange of India Limited.
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Ms. Kavita Semwal
	ii. PAN of the DP	DFUPS9434C
	iii. Designation of DP	Project Manager
	iv. Functional Role of DP	Operations
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	<b>No</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	Home First Finance Company India Limited BSE-543259 NSE-HOMEFIRST
	ii. No of shares traded and value (Rs.) (Date-wise)	Had executed contra-trade within a period of 6 months.  1. Sold on 27-06-2022: -100 equity shares @ Rs.752.75= Rs. 75,275  2. Purchased on 27-06-2022: -100 equity shares @ Rs.756.35= Rs.75,635  Loss – Rs. 360
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter-</b>	<b>No</b>

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	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	<p>Entering into Contra Trade transaction (being purchase and sale of shares within 6 months).</p> <p>Ms. Semwal had taken prior approval to sell shares of the Company. However, on June 27, 2022 post exercising her ESOPs, she had sold the shares and thereafter purchased 100 equity shares from the open market on the same day which tantamount to contra trade. Thus violates the Code of Conduct.</p>
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The Sale of Shares was done with the prior approval of the Compliance Officer. However, Ms. Semwal erroneously bought shares from the open market and incurred a loss of Rs. 360. With the purchase of the Shares, she had violated the code of conduct by entering into contra trade. In view of the same the Company had taken the following actions:</p> <p>1. Penalty: INR 3,782 being 5% of Purchase transaction amount to be deposited in IPEF administered by SEBI.</p>
6	Reasons recorded in writing for taking action stated above	As per the internal policy of the Company.
7	Details of the previous instances of violations, if any, since last financial year	Ms. Kavita Semwal had violated the Code of Conduct of the Company in FY22 and the same was intimated to the Exchanges vide letter No HFFCIL/BSE/NSE/EQ/104/2021-22 dated December 9, 2021.
8	If any amount collected for Code of Conduct violation(s) :	<b>Yes</b>
	i. Mode of transfer to SEBI-IPEF (Online/Demand Draft)	Online

	ii. Details of transfer/payment:  In case of Online: <b>Name of Transferor: Ms. Kavita Semwal</b> <b>Bank Name and Branch: HDFC Bank Limited and MIDC Branch</b> <b>UTR/Transaction Number: 219918157663</b> <b>Transaction Date: 18-07-2022</b> <b>Transaction Amount: Rs. 3,782</b>  In case of Demand Draft: Not Applicable	
9	Any other relevant information	-

Yours faithfully,  
**For Home First Finance Company India Limited**

Date: July 19, 2022  
Place: Mumbai

Shreyans Bachhawat  
Company Secretary and Compliance Officer  
ACS No.: 26700  
PAN: AJDPB9500E  
Email ID: shreyans.bachhawat@homefirstindia.com