



UTTAM SUGAR MILLS LIMITED

Corporate Office : A-2E, III Floor, CMA Tower, Sector-24, NOIDA-201 301 Uttar Pradesh, India
Telephone : 0120-4525000 E-mail : uttamsugarnoida@uttamsugar.com

November 14, 2022

National Stock Exchange of India Ltd.
Listing Department
"Exchange Plaza", Bandra-Kurla Complex,
Bandra (E), Mumbai - 400 051

Ref. :- Symbol - UTTAMSUGAR

B.S.E. Limited
Listing Department
P.J. Towers,
Dalal Street,
Fort, Mumbai - 400 001
Ref. - Scrip Code - 532729

Dear Sir/Madam,

Sub: Update on violations under SEBI (Prohibition of Insider Trading) Regulations, 2015

This is in continuance of our earlier reporting on the captioned subject submitted by the Company on 29th October, 2022, wherein the Company has submitted the event of violation of the Code of Conduct under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

We wish to inform you that the Audit Committee and the Board, at their meeting held today, has taken a note of the said reported violation related to Code of Conduct under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

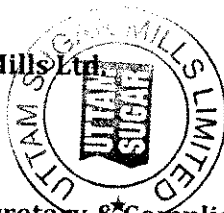
Disclosure pertaining to update on the matter enclosed as **Annexure A**. You are requested to take the same on record.

Yours faithfully,

For Uttam Sugar Mills Ltd.

(Rajesh Garg)

Joint Company Secretary & Compliance Officer

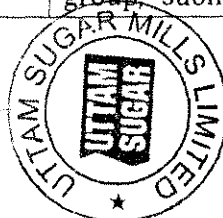


✗ Encl : as above

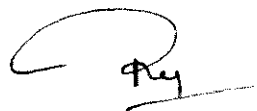
**Report by Uttam Sugar Mills Limited for violation related to Code of Conduct under SEBI
(Prohibition of Insider Trading) Regulation, 2015
Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulation, 2015**

S.No.	Particulars	Details
1.	Name of the Listed Company	Uttam Sugar Mills Limited
2.	Please tick the appropriate checkbox Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3.	E. Details of Designated Person (DP)	
	i. Name of DP	Mrs. Ranjana Chopra
	ii. PAN of DP	AAFPC2296R
	iii. Designation of DP	Member of Promoter Group
	iv. Functional role of DP	-
	v. Whether DP is Promoter or belongs to Promoter Group	Yes
	F. 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
	G. Details of transaction(s)	
	i. Name of the Scrip	Uttam Sugar Mills Limited BSE : 532729 NSE : UTTAMSUGAR
	ii. No. of shares traded and value (Rs.) (Date-wise)	Date: October 17, 2022 Purchased 2 Equity Shares for Rs. 517.50 Date: October 18, 2022 Sold 1 Equity Share for Rs. 255.60
	H. In case the value of trade(s) is more than Rs. 10 Lakhs 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	27.10.2022
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	29.10.2022
4.	Details of violations observed under Code of Conduct	Mrs. Ranjana Chopra, a member of the promoter group, suomoto, informed the Company that

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		<p>erroneously and inadvertently, trade orders (buy & sell) had been placed on exchange which were also executed. On realizing about the incident, she informed the company about the incident on 27th October, 2022.</p> <p>The aforesaid contra trade were taken place during closure of Trading Window which were in violation of Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015</p>
5.	Action taken by Listed Company	<p>Warning letter has been issued to Mrs. Ranjana Chopra that she would not engage in any kind of dealings in the Equity Shares of the Company which is consider as violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and a monetary penalty of Rs. 500/- has also been imposed.</p> <p>The aforesaid penalty has been duly deposited to the Investor Protection and Education Fund (IPEF) of SEBI.</p>
6.	Reasons recorded in writing for taking action stated above	<p>The action stated above was taken after considering the fact that she has suo-moto came forward to intimate the above transaction(s) to the Compliance Officer and acknowledged her mistake. It was also considered that this was a first instance of violation made by her and the amount involved in transaction was negligible and done inadvertently.</p> <p>She has also confirmed that she was not in possession of any Unpublished Price Sensitive Information (UPSI).</p> <p>She has also undertaken that she would be extra cautious and ensure the compliance of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 for any dealings in equity shares of the Company in future.</p>
7.	Details of the previous instances of violations, if any, since last financial year	N.A.
8.	If any amount collected for Code of Conduct violation(s)	The DP has deposited Rs. 500 /- with the Company for the aforesaid violation.




	i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft)	Online Payment
	ii. Details of transfer/payment	
	In case of Online:	
	Particulars	Details
	Name of the transferor	Uttam Sugar Mills Limited
	Bank Name, branch and Account number	SEBI IPEF Account no. 012210210000008 Bank of India, Bandra-Kurla Complex
	UTR/Transaction reference Number	PUNBH22309308720
	Transaction date	05/11/2022
	Transaction Amount (in Rs.)	500/-
	In case of Demand Draft (DD): Not Applicable	
	Particulars	Details
	Bank Name and branch	N.A.
	DD Number	
	DD Date	
	DD amount (in Rs.)	
9.	Any other relevant information	N.A.

Yours faithfully,

For Uttam Sugar Mills Ltd.



(Rajesh Garg)

Joint Company Secretary & Compliance Officer



Encl : as above