

By online submission

Sec/23-24/110
Date: 09-02-2024

To,
The General Manager,
Department of Corporate Services
BSE Ltd.
1st Floor, New Trading Ring,
Rotunda Building, P. J Tower,
Dalal Street, Fort
Mumbai-400 001
BSE Code: 524370

To,
The General Manager,
National Stock Exchange of India Ltd.
Exchange Plaza,
Plot No. C/1, G Block,
Bandra Kurla Complex,
Bandra (E), Mumbai-400 051.
NSE Code: BODALCHEM

Dear Sir /Madam,

Sub: Reporting of violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

This is in reference to SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 ("SEBI Circular") The Company hereby report violation related to its Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by one of its designated person.

Details of the violation are provided as per **Annexure-A** of the SEBI Circular and is enclosed.

You are requested to take the same on record.

Thanking you,

Yours faithfully,
For, BODAL CHEMICALS LTD

Ashutosh B Bhatt
Company Secretary
Encl: a/a



HEAD OFFICE:

Plot No. 123-124, Phase-I,
G.I.D.C, Vatva, Ahmedabad- 382 445.,
Gujarat, India.

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2583 4223, 25831684

Fax: +91 2583 5245, 25836052

E-mail: bodal@bodal.com

PLANT OFFICE:

UNIT - 2
Plot No. 123-124, Phase-I, G.I.D.C.
Vatva, Ahmedabad-382445.

Tel: 9909950855 / 856 / 857 / 858



Annexure-A

Report by Bodal Chemicals Limited for violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed Companies: 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 | BODAL CHEMICALS LIMITED | | | |
| 2 | Reporting in capacity of: | | | | |
| | <input type="radio"/> Listed Company | Listed Company | | | |
| | <input type="radio"/> Intermediary | | | | |
| <input type="radio"/> Fiduciary | | | | | |
| 3 | A. Details of Designated Person (DP) | | | | |
| | i. Name of the DP | Yogeshbhai Chandubhai Patel | | | |
| | ii. PAN of the DP | ATYPP7374F | | | |
| | III. Designation of DP | Store In-charge | | | |
| | iv. Functional Role of DP | Store In-charge | | | |
| | 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 | Bodal Chemicals Ltd BSE Code: 524370 NSE Code: Bodalchem | | | |
| | ii. No of shares traded and value (Rs.) (Date- wise) | Trading Date | No of Shares | Total Value of Shares | |
| | | 30/01/2024 | 500 | 42100.00 | |
| | | 24/01/2024 | 100 | 7920.00 | |
| | | 20/01/2024 | 400 | 32865.05 | |
| TOTAL | | 1000 | 82885.05 | | |
| 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 | Not Applicable | | | | |

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| | | |
|---|--|---|
| | 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 | traded in Company's Shares during the Closure of Trading Window/Trading Restrictions Period Mr. Yogeshbhai C. Patel, Designated person of the Company Sold 1000 Equity Shares of the Company in various date (As mentioned above) during trading restriction period. |
| 5 | Action taken by Listed company | After considering Deviation Report dated 05-02-2024 and Explanation provided by DP through email dated 06-02-2024, Chairman of the Board and Chairman of Audit Committee, issued a Warning Letter as first-time identification of violation of code and PIT Regulation by DP and directed to him as well as his immediate relatives and dependents, not to engage in any kind of dealings in the Equity Shares of the Company which is in violation to the Code of Conduct for prevention of Insider Trading and to avoid situations where the Company can levy penalties and take strict disciplinary actions as stipulated in Company's Code of Conduct in future. |
| 6 | Reasons recorded in writing for taking action stated above | The action stated above was taken after considering the fact that first instance of inadvertent violation made by DP erroneously in placing the order on exchange. |
| 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): The details of transfer of profit arising from contra trade are as under: | |
| | i. Mode of transfer to SEBI - IPEF Online/Demand Draft) | NA |
| | ii. Details of transfer/payment | |
| | In case of Online: | |
| | Particulars | Details |
| | Name of the transferor | |

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| | | |
|----------|--------------------------------------|----------------|
| | Bank Name, branch and Account number | NA |
| | UTR/Transaction reference Number | |
| | Transaction date | |
| | Transaction Amount (in Rs.) | |
| | In case of Demand Draft (DD): | |
| | Particulars | Details |
| | Bank Name and branch | NA |
| | DD Number | |
| | DD date | |
| | DD amount (in Rs.) | |
| 9 | Any other relevant information | --- |

For, Bodal Chemicals Limited

Ashutosh B Bhatt
Company Secretary

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