



**SUPER SALES INDIA LIMITED**

Friday, August 07, 2020

To

BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Mumbai – 400 001.  
Fax No.022-22658121

Dear Sir,

**Sub: Report relating to violation of Code of Conduct of the Company formulated pursuant to Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015-reg**

Ref: our letter dated 27<sup>th</sup> July, 2020 filed with BSE Listing center

We are submitting herewith a report relating to violation of Code of Conduct of the Company formulated pursuant to Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 by a member of promoter group for your records.

Thanking you,

Yours faithfully,  
For Super Sales India Limited

S K Radhakrishnan  
Company Secretary

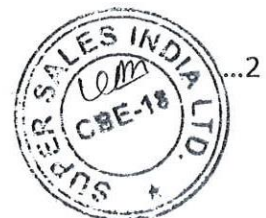


**SUPER SALES INDIA LIMITED**

**Report by Super Sales India Limited (listed company) for violations 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/ Intermediary/Fiduciary	Super Sales India Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr.Sathpurushan Veluswamy
	ii. PAN of the DP	AAJPV6846L
	iii. Designation of DP	Member of Promoter Group
	iv. Functional Role of DP	The DP does not have any functional role in the Company
	v. Whether DP is Promoter or belongs to PromoterGroup	belongs to the Promoter Group
	<b>B. If Reporting is for immediate relative of DP</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	Super Sales India Limited (512527)
	ii. No of shares traded and value (Rs.) (Date-wise)	12,400 equity shares were sold for a total consideration of Rs. 26,72,238.10 during the period from 20 <sup>th</sup> July 2020 to 24 <sup>th</sup> July 2020



**REGISTERED OFFICE :** 34-A, Kamaraj Road, Coimbatore - 641 018, India. Phone : 2222404 to 05

Web: www.supersales.co.in CIN: L17111TZ1981PLC001109 PAN No. AADCS0650A GSTIN: 33AADCS0650A1Z4



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<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	
i. Date of intimation of trade(s) by concerned promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	27.07.2020
ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	27.07.2020
4 Details of violations observed under Code of Conduct	<p>Mr.Sathpurushan Veluswamy had acquired 12,400 equity shares by way of transmission of shares upon the demise of Late Sri. R.Venkatrangappan, who was a member of the promoter group. He did not inform the company within 7 days of transmission of shares to him. He became a Member of the Promoter Group as per Regulation 31A(6) of SEBI LODR</p> <p>He subsequently, sold 12,400 equity shares of the Company in the open market through BSE Limited during the period from 20<sup>th</sup> July 2020 to 24<sup>th</sup> July 2020, when the trading window of the Company was closed for trading by designated persons and had not made any application to the Company to obtain pre-clearance from the Compliance Officer of the Company for trading in the equity shares of the company in the open market.</p>

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5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The Compliance Officer of the Company had issued a Show Cause Notice dated 27<sup>th</sup> July 2020 to Mr.Sathpurushan Veluswamy for the violation of the Code of Conduct pursuant to which a reply was received from him on 28<sup>th</sup> July 2020.</p> <p>The matter was then reported to the Audit Committee which confirmed the violation of Code of Conduct formulated under SEBI (Prohibition of Insider Trading) Regulations, 2015 by Mr.Sathpurushan Veluswamy and recommended a penalty of Rs.3,00,000/- on 30<sup>th</sup> July, 2020.</p> <p>Subsequently, the Board of Directors of the Company at their meeting held on 30<sup>th</sup> July, 2020, on the recommendation of the audit committee approved and levied a penalty of Rs. 3,00,000/- on Mr. Sathpurushan Veluswamy.</p>
6	Reasons recorded in writing for taking action stated above	<p>Considering the facts and circumstances of the case of default by Mr.Sathpurushan Veluswamy, the Company imposed a penalty of Rs.3,00,000/- for violation of the Code of Conduct formulated under Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> <p>The Audit Committee &amp; the Board of Directors were of the opinion that the penalty is commensurate with the aforesaid violation as detailed in point 4 above.</p>
7	Details of the previous instances of violations, if any, since last financial year	Nil



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8	If any amount collected for Code of Conduct violation(s)	Nil
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online / <del>Demand Draft</del>
	<b>ii. Details of transfer/payment</b>	
	<b>In case of Online:</b>	
	<b>Particulars</b>	<b>Details</b>
	Name of the transferor	Super Sales India Limited
	Bank Name, branch and Account number	Indian Bank, Coimbatore Main Branch Account No. 447867588
	UTR/Transaction reference Number	IDIBR52020080620940734
	Transaction date	06-08-2020
	Transaction Amount (in Rs.)	Rs. 3,00,000/-
9	Any other relevant information	Nil

Date 07.08.2020  
Place: Coimbatore

Yours faithfully,  
For Super Sales India Limited

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S K Radhakrishnan  
Company Secretary & Compliance Officer  
PAN: AHUPR5591G  
Email ID: [secretary@vaamaa.com](mailto:secretary@vaamaa.com)



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