

TRIDENT LIFELINE LIMITED

(Formerly Trident Lifeline Private Limited)

Date: 18.01.2023

BSE Limited 14 th Floor, P. J. Towers, Dalal Street, Fort, Mumbai – 400001.	Stock ID: TLL Scrip Code: 543616
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Dear Sir/Ma'am,

Sub: Inadvertently Trade by the Designated Person

We reliably understand from our Independent Director, Ms. Aena Surana that she has purchased 10,800 equity shares of the Company entirely inadvertently and without any intention of reaping abnormal gains when the trading window was closed viz., on 14th October, 2022.

The Audit Committee of the Company was notified of this incident. Based on Ms. Aena Surana's clarification, it is concluded that this was an inadvertent trade made without any intent to violate the SEBI (Prohibition of Insider Trading) Regulation, 2015 and Company's code on Insider Trading. However, as there was an infraction of the Company's Code and the SEBI Regulations, a penalty of Rs. 25,693/- has been imposed on the Independent Director upon confirmation by the Audit Committee at its meeting held on 16th January, 2023 and the said amount shall be remitted to Investor Protection Education Fund (IPEF) in accordance with the SEBI Regulations.

You are requested to kindly take the note of above on records.

Thanking You,

Yours Faithfully

For **Trident Lifeline Limited**,**Kunal Amrishbhai Chauhan****Company Secretary & Compliance Officer**

M No.: A60163

Encl.: a/a

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**Report by Trident Lifeline Limited for Violations Related to Code of Conduct under SEBI
 (Prohibition of Insider Trading) Regulations, 2015.**

(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	TRIDENT LIFELINE LIMITED
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Aena Surana
	ii. PAN of the DP	KBQPS4127D
	iii. Designation of DP	Independent & Non-Executive Director
	iv. Functional Role of DP	Non-Executive Director
	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	-
	ii. PAN of the immediate relative of DP	-
	C. Details of transaction(s)	
	i. Name of the scrip	Trident Lifeline Limited Scrip Code- 543616
	ii. No of shares traded and value (Rs.) (Date- wise)	10,800 Shares at Rs. 118.95 per share Amounting of Rs. 12,84,660.00 On 14 th October, 2022
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	

Registered Office: 2004, 2nd Floor, North Extension, Falsawadi, Ring Road, Surat-395003, Gujarat, INDIA.

Tel : +91 261 2451274, 2451284 Email : info@tridentlifeline.com Web : www.tridentlifeline.com

Corporate Office: 2001, 2nd Floor, APMC, Krushi Bazar, Falsawadi, Ring Road, Surat-395003, Gujarat, INDIA.

Tel : +91 261 2490224, 2490225

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	No intimation given by DP
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation	Not applicable since the Company is not required the manual filing of disclosures as required under Regulation 7(2) (a) & (b) of PIT Regulations pursuant to SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2021/617 dated 13.08.2021.
4	Details of violations observed under Code of Conduct	Aena Surana, Independent Director of the Company has Purchased 10,800 equity shares on 14th October, 2022 of Trident Lifeline Limited during the period of closure of Trading Window.
5	Action taken by Listed company/ Intermediary/ Fiduciary	Audit Committee of the Company has imposed a Penalty of Rs. 25,693/- (i.e. 2% of trade Value)
6	Reasons recorded in writing for taking action stated above	The DP is Independent Director and the DP does not exercise any control over the day to day affairs or decision making which may result in influencing the price of shares of the Company. 1. As submitted by DP, it was an entirely inadvertent trade without any intention of reaping abnormal gains

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		<p>and that the timing of the purchase was purely unintentional.</p> <p>2. DP was not in possession of any unpublished price sensitive information of the Company.</p> <p>3. It is a first time violation.</p> <p>4. DP has no control over day to day decision making such as would enable her to have the information which could influence share price so that neither she nor her immediate relative could take any undue advantage of the same.</p> <p>5. Written assurance/undertaking from DP not to deal in the Company's shares in future at all without first confirming with the Compliance Officer regarding the compliance as may be applicable.</p>
7	Details of the previous instances of violations, if any, since last financial year	It is a first time violation by DP.
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Rs. 25,693/-
	ii. Details of transfer/payment- In case of Online:	
	Particulars	Details
	Name of the transferor	Aena Surana
	Bank Name, branch and Account number	Indusind Bank Vesu-Surat Branch Ac No. 159327866888
	UTR/Transaction reference Number	INDBN17010877735
	Transaction date	17 th January, 2023
	Transaction Amount (in Rs.)	Rs. 25,693/-
	In case of Demand Draft (DD):	
	Particulars	Details

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CIN No. : L51909GJ2014PLC078227

GST No. : 24AAECT8906D1ZG

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	Bank Name and branch		
	DD Number		
	DD date		
	DD amount (in-Rs.)		
9	Any other relevant information	Aena Surana by her letter confirmed that it was an inadvertent trade made without intent to violate the Company's Insider Trading Policy or the SEBI (Prohibition of Insider Trading) Regulations, 2015 and also she was not in possession of any Unpublished Price Sensitive Information (UPSI) of the Company while making the aforesaid purchase of shares.	

Yours Faithfully

For Trident Lifeline Limited

Kunal Amrishbhai Chauhan

Company Secretary & Compliance Officer

M No.: A60163

PAN: ASHPC8528L

Email ID: compliance@tridentlifeline.com

Date: 18.01.2023

Place: Surat

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