

November 08, 2019

The Manager, Listing Department, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400 001	The Manager, Listing Department, National Stock Exchange of India Limited Exchange Plaza, 5th Floor, Plot No. C/1, G Block, Bandra-Kurla Complex, Bandra-East, Mumbai- 400 051
Ref: Scrip Code: 532953	Ref: Symbol: VGUARD

Dear Sir,

Sub: Intimation w.r.t violation of code of conduct for trading in the securities of the Company by Designated Persons

The Board of Directors of the Company have observed that an employee of the Company has violated the Company's internal code of conduct for trading in the securities of the Company by Designated Persons formulated as per Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. In this connection, Company has sought clarification from the employee and his reply is attached with this letter.

Kindly take the information on your record.

Thanking You,

For V-Guard Industries Limited



Jayasree K  
Company Secretary  
(Membership No. ACS: 15900)

**V-GUARD INDUSTRIES LTD.**

Regd. office 42/962,  
Vennala High School Road,  
Vennala, Kochi - 682 028.  
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To

Date: 01.11.2019

*Ms. Jayshree*  
*Company Secretary*  
*M/s V-Guard Industries Limited,*  
*42/962, Vennala High School Road,*  
*Vennala, Kochi- 682028*

Subject: Clarification with respect to Sale of V-Guard Shares.

Dear Madam,

I have been allotted 5895 number of shares in 2018 and 5896 number of shares in 2019 from our Company M/s. V-Guard Industries Limited as per Company ESOP policy. Accordingly, the same has been sold, the 5895 shares were sold during trading window allowed period. However, inadvertently I sold 5890 number of shares on 30<sup>th</sup> October 2019 during trading window closure period.

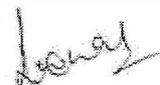
Although, I have received mail on 30.09.2019 from our you/ Company Secretary that the trading window is closed from 1<sup>st</sup> October 2019 and trading will resume from 11<sup>th</sup> November 2019. I forgot to take pre-clearance from the company for selling the said shares and also missed the mail and checked it lately after selling of 5890 number of shares on dated 30.10.2019 at a price of 2500 @ Rs. 240 and 3390 @ Rs. 240.50 respectively. The purchase price on which I had paid tax was 225 per share.

On the same day itself I had verbally communicated the same to our Company Secretary. This has been done inadvertently by me due to certain exigencies at home.

I have no other intention other than mentioned herein above. I am ready to give an affidavit on oath with respect to the same.

I would request you to take a lenient view on the issues.

Thanking you,  
Yours Sincerely,



Roopak Ahluwalia  
Legal Department