

August 2, 2021

To, <b>BSE Limited</b> Department of Corporate Services, P. J. Towers, Dalal Street, Fort, Mumbai – 400 001 <b>Scrip Code: 532543</b>	To, <b>National Stock Exchange of India Ltd.</b> Exchange Plaza, 5 <sup>th</sup> Floor, G-Block, Bandra Kurla Complex, Bandra East, Mumbai 400 051 <b>Scrip Symbol: GULFPETRO</b>
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**Sub: Reporting of violation of code of conduct of the Company under SEBI Insider Trading Regulations, 2015**

Dear Sir/Madam,

In terms of provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, we enclose herewith the report on violations under SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct by Designated persons and or their immediate relatives.

This is for your information and record.

Thanking you,

Yours faithfully,  
For GP Petroleums Limited



Bijay Kumar Sanku  
Company Secretary  
Encl : Annexure

**ANNEXURE A**

Report by GP Petroleums Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

(For listed company: 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	GP Petroleums Limited
2	Please tick appropriate checkbox Reporting in capacity of : • Listed Company • Intermediary • Fiduciary	Listed Company
3.	<b>A. Name of the Designated Person (DP) / Director</b>	
	i. Name of Designated Person / Director	Ms. Pallavi Goel
	ii. PAN	AKRPG3131F
	iii. Designation	Person from promoter group
	iv. Function Role	Director
	v. Whether DP is Promoter or belongs to No Promoter Group	Yes
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	GP Petroleums Limited
	ii. No of shares traded and value (Rs.) (Date wise)	Purchase 3,000 Shares at average rate of Rs. 64.41 per share aggregating to Rs. 1,93,230
	<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 DP/Director/Promoter/ Promoter Group to Company under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	28-6-2021
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	29-6-2021
4	Details of violations observed under Code of Conduct	Mrs. Pallavi Goel had obtained approval for sale of shares during window open





GP+  
GLOBAL



		period. However while executing sale inadvertently executed a purchase transaction for 3000 shares @ 64.41 for value Rs.1,93,230 leading to contra trade violation. This was due to miscommunication with trading desk.
5	Action taken by Listed Company / Intermediary / Fiduciary	Letter notice was issued to Mrs. Pallavi Goel, who responded to the same and admitted it was an inadvertent mistake due to miscommunication with trading desk. The matter was referred to the Audit Committee. The committee examined the facts. The person was not in possession of UPSI and has not made any undue gain. However since it was first time unintentional violation, the Committee levied a fine of Rs.5000/- which was collected from the person and disgorged to SEBI Investor Protection and Education Fund.
6.	Reasons recorded in writing for taking action stated above	Explanation was sought from Mrs. Pallavi Goel. She admitted that it was an inadvertent mistake due to miscommunication with the trading desk.
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)	Rs. 5,000/-.
	Mode of transfer to SEBI - IPEF Online/Demand Draft)	Online
Details of Transfer / Payment In case of Online : Yes		
<b>Particulars</b>		<b>Details</b>
Name of the transferor		GP Petroleums Limited (Company has collected fine from her and same is being deposited into SEBI IPEF A/c)
Bank Name, branch and Account number		Our Bank - HDFC Bank Our Branch – Ahrua Centre Our Account No. 05430330001634
UTR / Transaction Reference Number		Bank Reference No. N212211583666573
Transaction Date		31-7-2021
Transaction Amount		Rs. 5,000/-
In case of Offline : Demand Draft		
<b>Particulars</b>		<b>Details</b>





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GLOBAL	Bank and Branch	
	DD Number	
	DD Date	
	DD Amount	
9.	Any other relevant information	None

Yours faithfully,  
For GP Petroleums Limited



Bijay Kumar Sanku  
Company Secretary  
Pan AXPPS8546K  
bijay.kumar@gpglobal.com  
9833629730