



October 18, 2021

To,

<b>BSE Limited</b> Department of Corporate Services, P. J. Towers, Dalal Street, Mumbai – 400 001 (Scrip Code-508933)	<b>National Stock Exchange of India Limited</b> Exchange Plaza, Bandra-Kurla Complex, Bandra (E), Mumbai – 400 051 (Symbol : AYMSYNTEX)
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Dear Sirs/ Madam,

**Subject: Reporting under the SEBI (Prohibition of Insider Trading) Regulations, 2015.**

Kindly find attached Report under the SEBI (Prohibition of Insider Trading) Regulations, 2015 against the Designated Person for non-adherence with the Code of Conduct of the Company under the aforesaid regulation.

A warning letter has been issued to the Designated Person and he has deposited the penalty in the SEBI-IPEF account on October 18, 2021 as per the SEBI Guidelines.

Kindly take the same on record.

Thanking you,

**For AYM Syntex Limited**

**Ashitosh Sheth**  
Company Secretary  
ACS 25997

**AYM SYNTEX LIMITED**



Annexure A

**Report by AYM SYNTEX 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	AYM SYNTEX LIMITED	
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : Listed Company <del>Intermediary</del> <del>Fiduciary</del>	Listed Company	
3	<b>A. Details of Designated Person (DP)</b>		
	i.	Name of the DP	<b>Mr. Ratan Sarmadhikari</b>
	ii.	PAN of the DP	<b>ANAPS7278R</b>
	iii.	Designation of DP	<b>General Manager - Costing</b>
	iv.	Functional Role of DP	Supervisory
	v.	Whether DP is Promoter or belongs to Promoter Group	<b>No</b>
	<b>B. If Reporting is for immediate relative of DP</b>		
	i.	Name of the immediate relative of DP	Nil
	ii.	PAN of the immediate relative of DP	<b>NA</b>
	<b>C. Details of transaction(s)</b>		
	i.	Name of the scrip	<b>AYM SYNTEX LIMITED</b>
	ii.	No of shares traded and value (Rs.) (Date-wise)	Entering into contra transaction ie Purchase and Sale of Shares (775 shares) during the period 16.09.2021 to 22.09.2021 when the trading window was opened.
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>		

**AYM SYNTEX LIMITED**



	i.	Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	N.A.
	ii.	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	N.A.
4	Details of violations observed under Code of Conduct		Entering into contra transaction ie Purchase and Sale of Shares during the period when the trading window was opened
5	Action taken by Listed company/ <del>Intermediary/</del> Fiduciary		As recommended by the Share Trading Committee Rs. 6,000/- is imposed as penalty and shall be liable to be disgorged for remittance to the SEBI Board for credit to the Investor Protection and Education Fund administered by the SEBI.  Further, DP has been advised to follow the Company's Code of Conduct For Regulating, Monitoring And Reporting of Trading by Insiders and not to indulge in such act in future.
6	Reasons recorded in writing for taking action stated above		As per the recommendation of the Share Trading Committee a warning is issued and monetary penalty imposed to deter the violator from indulging in such conducts in future.
7	Details of the previous instances of violations, if any, since last financial year		NA
8	If any amount collected for Code of Conduct violation(s)		
	i. Mode of transfer to SEBI – IPEF (Online/Demand Draft)		Online

#### AYM SYNTEX LIMITED

**In case of online payment**

Particulars	Details
Name of the transferor	<b>Ratan Sarmadhikari</b>
Bank Name, branch and Account number	SBI Bank, DANA Bunder Branch, Mumbai Account No. - 00000051120736343
UTR/Transaction reference Number	Ref. no. IRR6523333; UTR no. SBIN321291909432
Transaction date	18 October 2021
Transaction Amount (in Rs.)	6000

**In case of Demand Draft (DD):**

Particulars	Details
<b>Bank Name and branch</b>	NA
<b>DD Number</b>	
<b>DD date</b>	
<b>DD amount (in Rs.)</b>	

9	Any other relevant information	None
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Date and Place

Name and Signature of Compliance Officer

Ashitosh Sheth  
PAN: CBXPS6121G  
Email ID: complianceofficer@aymgroup.com

**AYM SYNTEX LIMITED**