



PROUD TO BE INDIAN
PRIVILEGED TO BE GLOBAL

HEG/SECTT/2020

10th August, 2020

1	BSE Limited P J Towers Dalal Street MUMBAI - 400 001. Scrip Code : 509631	2	National Stock Exchange of India Limited Exchange Plaza, 5th Floor Plot No.C/1, G Block, Bandra - Kurla Complex Bandra (E), MUMBAI - 400 051. Scrip Code : HEG
---	--	---	---

Sub: Intimation under SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sirs,

This is to inform you that in term of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of Company's Code for Regulating, Monitoring & Reporting Trading by Designated Employees along with the action taken by the Company thereon is enclosed as Annexure to this letter.

Kindly take same on the record.

Thanking you,

Yours faithfully,
For HEG Limited


(Vivek Chaudhary)
Company Secretary
A-13263

heg.investor@lnjbhilwara.com

Encl : as above.

HEG LIMITED

Corporate Office :

Bhilwara Towers, A-12, Sector-1
Noida - 201 301 (NCR-Delhi), India
Tel.: +91-120-4390300 (EPABX)
Fax: +91-120-4277841
Website: www.lnjbhilwara.com

Regd. Office :

Mandideep (Near Bhopal) Distt. Raisen - 462046
(Madhya Pradesh), India
Tel.: +91-7480-405500, 233524 to 233527
Fax: +91-7480-233522
Website: www.heg ltd.com

ISO 9001
BUREAU VERITAS
Certification



ISO 14001
BUREAU VERITAS
Certification



Corporate Identification No.: L23109MP1972PLC008290

Report by HEG 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	HEG 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	Manoj Kumar Gupta		
	ii. PAN of the DP	ADPPG2678E		
	iii. Designation of DP	Deputy General Manager		
	iv. Functional Role of DP	Working in Design department of the Company		
	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	NA		
	ii. PAN of the immediate relative of DP	NA		
	C. Details of Transaction(s)			
	i. Name of the scrip	HEG Limited-Equity Shares		
	ii. No of shares traded and value (Rs) (Date- wise)	Date	No of shares traded	Amount(Rs)
		20th April, 2020	Buy-10	8500
	D. In case value of trade(s) is more than Rs 10 lacs in a calendar quarter			

	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015.	NA
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA
4.	Details of violations observed under Code of Conduct.	Clause 2.2 of Code of Conduct (Trade in closure of trading window)
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Audit Committee and Board of Directors of the Company at their meeting held today, i.e. 10 th August, 2020 reviewed the matter and this being first instance of violation by the aforementioned Designated Person imposed a fine of Rs 10,000/- and issued a warning to take utmost care in future to avoid further stringent action.
6.	Reasons recorded in writing for taking action stated above	The Audit Committee & Board of Directors of the Company imposed a fine after taking into account the explanation furnished by the Designated Person regarding inadvertent sale of shares. Further the Audit Committee & Board of Directors also considered the quantum of shares involved and it being the first instance of non-compliance of Code of Conduct by the Designated Person.
7.	Details of the previous instances of violations, if any, since last financial year	NA
8.	If any amount collected under Code of Conduct violation(s)	The above decision of the Audit Committee and Board has been intimated to the Designated Person today i.e. 10 th August, 2020 and also directed to transfer the imposed fine of Rs 10,000/- to SEBI-IPEF, the detail of deposit of such fine will be intimated separately upon receipt of same from the above Designated Person.
	i. Mode of transfer to SEBI-IPEF (Online/Demand Draft)	

ii. Details of transfer/payment

In case of Online:

Particulars	Details
Name of transferor	
Bank Name, branch and Account number	
UTR/Transaction reference	
Transaction date	
Transaction Amount (in Rs.)	

In case of Demand Draft (DD):

Particulars	Details
Bank Name and branch	
DD Number	
DD date	
DD amount (in Rs)	

9.	Any other relevant information	-
----	--------------------------------	---

Yours faithfully,
For **HEG Limited**



Vivek Chaudhary
Company Secretary
A-13263
PAN: AEMPC9546D
heg.investor@lnjbhilwara.com
Place: Noida
Date: 10th August, 2020

Report by HEG 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	HEG 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	Vinod Mehta
	ii. PAN of the DP	ADYPM5440R
	iii. Designation of DP	Vice President
	iv. Functional Role of DP	Vice President-Commercial. Resigned and Relocated w.e.f. 5th June, 2020 to our Group Company i.e. RSWM. However he will continue to support HEG Limited for common purchase items between two Companies.
	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	NA	

	ii. PAN of the immediate relative of DP	NA		
	C. Details of Transaction(s)			
	i. Name of the scrip	HEG Limited-Equity Shares		
	ii. No of shares traded and value (Rs) (Date- wise)	Date	No of shares traded	Amount(Rs)
		23th March, 2020	Buy-50	48257.63
		9 th June, 2020	Sell-50	97935.14
	D. In case value of trade(s) is more than Rs 10 lacs in a calendar quarter			
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015.	NA		
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA		
4.	Details of violations observed under Code of Conduct.	a) Clause 2.2 of Code of Conduct (Trade in closure of trading window) b) Clause 2.5 of code (contra trade)		
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Audit Committee and Board of Directors of the Company at their meeting held today, i.e. 10 th August, 2020 reviewed the matter and this being first instance of violation of Code of Conduct by the aforementioned Designated Person imposed a fine of Rs 50,000/-only and issued a warning to take utmost care in future to avoid further stringent action.		
6.	Reasons recorded in writing for taking action stated above	The Audit Committee & Board of Directors of the Company imposed a fine after taking into account the explanation furnished by the Designated Person regarding inadvertent sale of shares. Further the Audit Committee & Board of Directors also considered the quantum of shares involved and it being the first instance of non-compliance of Code of Conduct by the Designated Person. The Board and Audit Committee noted that profits earned from contra trade has been deposited to		

		SEBI-IPEF on 14 th July, 2020												
7.	Details of the previous instances of violations, if any, since last financial year	NA												
8.	If any amount collected under Code of Conduct violation(s)	The above decision of the Audit Committee and Board has been intimated to the Designated Person today i.e. 10 th August, 2020 and also directed to transfer the imposed fine of Rs 50,000/- to SEBI-IPEF, the detail of deposit of such fine will be intimated separately upon receipt of same from the above Designated Person.												
	i. Mode of transfer to SEBI-IPEF (Online/Demand Draft)													
	ii. Details of transfer/payment													
	In case of Online:													
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td></td> </tr> <tr> <td>UTR/Transaction reference</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Name of transferor		Bank Name, branch and Account number		UTR/Transaction reference		Transaction date		Transaction Amount (in Rs.)		
Particulars	Details													
Name of transferor														
Bank Name, branch and Account number														
UTR/Transaction reference														
Transaction date														
Transaction Amount (in Rs.)														
	In case of Demand Draft (DD):													
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD amount (in Rs)</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs)				
Particulars	Details													
Bank Name and branch														
DD Number														
DD date														
DD amount (in Rs)														
9.	Any other relevant information	The profit of Rs 49,677.51 arising out of contra trade has been remitted to SEBI-IPEF the details of which are as under:												

		Particulars	
		Name of transferor	Vinod Mehta
		Bank Name, branch and Account number	ICICI Bank Hathi Building Branch Account No-004501017903
		UTR/Transaction reference	019609321898
		Transaction date	14 th July, 2020
		Transaction Amount (in Rs.)	Rs 49,677.51

Yours faithfully,
For **HEG Limited**

Vivek Chaudhary
Company Secretary
A-13263
PAN: AEMPC9546D
heg.investor@lnjbhilwara.com
Place: Noida
Date: 10th August, 2020

Report by HEG 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	HEG 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	Shaji Thomas
	ii. PAN of the DP	ACKPT9064F
	iii. Designation of DP	Senior Officer
	iv. Functional Role of DP	Working in Finance and Secretarial Department of the Company
	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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of Transaction(s)	
	i. Name of the scrip	HEG Limited-Equity Shares

	ii. No of shares traded and value (Rs) (Date- wise)	Date	No of shares traded	Amount(Rs)
		30 th March, 2020	Buy-50	22581
		21 st May, 2020	Sell-10	7512
		2 nd June, 2020	Sell-20	16480
		2 nd June, 2020	Sell-20	16499
D. In case value of trade(s) is more than Rs 10 lacs in a calendar quarter				
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015.	NA		
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA		
4.	Details of violations observed under Code of Conduct.	a) Clause 2.2 of Code of Conduct (Trade in closure of trading window) b) Clause 2.5 of code (contra trade)		
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Audit Committee and Board of Directors of the Company at their meeting held today, i.e. 10 th August, 2020 reviewed the matter and this being first instance of violation of Code of Conduct by the aforementioned Designated Person imposed a fine of Rs 25,000 only and issued a warning to take utmost care in future to avoid further stringent action.		
6.	Reasons recorded in writing for taking action stated above	The Audit Committee & Board of Directors of the Company imposed a fine after taking into account the explanation furnished by the Designated Person regarding sale of shares because of domestic emergency. Further the Audit Committee & Board of Directors also considered the quantum of shares involved and it being the first instance of		

		non-compliance of Code of Conduct by the Designated Person. The Board and Audit Committee noted that profit earned from contra trade has been deposited to SEBI-IPEF on 22 nd July, 2020												
7.	Details of the previous instances of violations, if any, since last financial year	NA												
8.	If any amount collected under Code of Conduct violation(s)	The above decision of the Audit Committee and Board has been intimated to the Designated Person today i.e. 10 th August, 2020 and also directed to transfer the imposed fine of Rs 25,000/- to SEBI-IPEF, the detail of deposit of such fine will be intimated separately upon receipt of same from the above Designated Person.												
	i. Mode of transfer to SEBI-IPEF (Online/Demand Draft)													
	ii. Details of transfer/payment													
	In case of Online:													
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td></td> </tr> <tr> <td>UTR/Transaction reference</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Name of transferor		Bank Name, branch and Account number		UTR/Transaction reference		Transaction date		Transaction Amount (in Rs.)		
Particulars	Details													
Name of transferor														
Bank Name, branch and Account number														
UTR/Transaction reference														
Transaction date														
Transaction Amount (in Rs.)														
	In case of Demand Draft (DD):													
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Bank Name and branch		DD Number		DD date						
Particulars	Details													
Bank Name and branch														
DD Number														
DD date														

	DD amount (in Rs)													
9.	Any other relevant information	<p>The profit of Rs 17910 arising out of contra trade has been remitted to SEBI-IPEF the details of which are as under:</p> <table border="1"> <thead> <tr> <th colspan="2">Particulars</th> </tr> </thead> <tbody> <tr> <td>Name of transferor</td> <td>Shaji Thomas</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>ICICI Bank Noida Sector-1 Account No-107001540939</td> </tr> <tr> <td>UTR/Transaction reference</td> <td>Payment made through IMPS vides reference no. : MMT/IMPS/020415261951/ SEBI INVES/BKID0000122</td> </tr> <tr> <td>Transaction date</td> <td>22nd July, 2020</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>Rs 17910</td> </tr> </tbody> </table>	Particulars		Name of transferor	Shaji Thomas	Bank Name, branch and Account number	ICICI Bank Noida Sector-1 Account No-107001540939	UTR/Transaction reference	Payment made through IMPS vides reference no. : MMT/IMPS/020415261951/ SEBI INVES/BKID0000122	Transaction date	22nd July, 2020	Transaction Amount (in Rs.)	Rs 17910
Particulars														
Name of transferor	Shaji Thomas													
Bank Name, branch and Account number	ICICI Bank Noida Sector-1 Account No-107001540939													
UTR/Transaction reference	Payment made through IMPS vides reference no. : MMT/IMPS/020415261951/ SEBI INVES/BKID0000122													
Transaction date	22nd July, 2020													
Transaction Amount (in Rs.)	Rs 17910													

Yours faithfully,
For **HEG Limited**

Vivek Chaudhary
Company Secretary
A-13263
PAN: AEMPC9546D
heg.investor@lnjbhilwara.com
Date: 10th August, 2020

Place: Noida

Report by HEG 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	HEG 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	Sandeep Shrivastava		
	ii. PAN of the DP	BDRPS9557F		
	iii. Designation of DP	Manager		
	iv. Functional Role of DP	Working in Captive Power department of the Company		
	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	NA		
	ii. PAN of the immediate relative of DP	NA		
	C. Details of Transaction(s)			
	i. Name of the scrip	HEG Limited-Equity Shares		
	ii. No of shares traded and value (Rs) (Date- wise)	Date	No of shares traded	Amount(Rs)
		28th April, 2020	Buy-1	793.59
		4 th May, 2020	Buy-3	2333.88

D. In case value of trade(s) is more than Rs 10 lacs in a calendar quarter		
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015.	NA
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA
4.	Details of violations observed under Code of Conduct.	Clause 2.2 of Code of Conduct (Trade in closure of trading window)
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Audit Committee and Board of Directors of the Company at their meeting held today, i.e. 10 th August, 2020 reviewed the matter and this being first instance of violation by the aforementioned Designated Person imposed a fine of Rs 10,000/- and issued a warning to take utmost care in future to avoid further stringent action.
6.	Reasons recorded in writing for taking action stated above	The Audit Committee & Board of Directors of the Company imposed a fine after taking into account the explanation furnished by the Designated Person regarding inadvertent sale of shares. Further the Audit Committee & Board of Directors also considered the quantum of shares involved and it being the first instance of non-compliance of Code of Conduct by the Designated Person.
7.	Details of the previous instances of violations, if any, since last financial year	NA
8.	If any amount collected under Code of Conduct violation(s)	The above decision of the Audit Committee and Board has been intimated to the Designated Person today i.e. 10 th August, 2020 and also directed to transfer the imposed fine of Rs 10,000/- to SEBI-IPEF, the detail of deposit of such fine will be intimated separately upon receipt of same from the above Designated Person.
	i. Mode of transfer to SEBI-IPEF (Online/Demand Draft)	

ii. Details of transfer/payment

In case of Online:

Particulars	Details
Name of transferor	
Bank Name, branch and Account number	
UTR/Transaction reference	
Transaction date	
Transaction Amount (in Rs.)	

In case of Demand Draft (DD):

Particulars	Details
Bank Name and branch	
DD Number	
DD date	
DD amount (in Rs)	

9.	Any other relevant information	-
----	--------------------------------	---

Yours faithfully,
For HEG Limited



Vivek Chaudhary
Company Secretary
A-13263
PAN: AEMPC9546D
heg.investor@lnjbhilwara.com
Date: 10th August, 2020