



# PPAP Automotive Limited

CIN: L74899DL1995PLC073281

B-206 A, Sector-81, Phase-II, Noida - 201305, U.P.;

Tel. : +91-120-2462552 / 53; Fax: +91-120-2461371;

Email: info@ppapco.com; Website: www.ppapco.in

13<sup>th</sup> August, 2020

**The Listing Department**

**BSE Limited**

Phiroze Jeejeebhoy Towers,

Dalal Street,

Mumbai – 400001

Symbol: 532934

**The Listing Department**

**The National Stock Exchange of India Limited**

Exchange Plaza,

Bandra Kurla Complex,

Bandra (E), Mumbai – 400051

Symbol: PPAP

**Subject: Report on violation of Company's Code of Conduct framed under SEBI (Prohibition of Insider Trading) Regulations, 2015**

Dear Sir(s),

Pursuant to Clause 13 of Schedule B read with Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015, please find enclosed herewith Report for violations related to Code of Conduct of the Company under SEBI (Prohibition of Insider Trading) Regulations, 2015, in "Annexure A" as prescribed by SEBI vide circular SEBI/HO/ISD/ISD/CIR/P/2020/135, dated 23<sup>rd</sup> July, 2020.

This is for your information and record.

Thanking you,

Yours faithfully,

For **PPAP Automotive Limited**

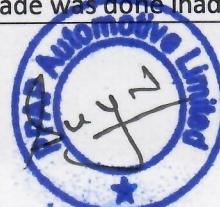
**Sonia Bhandari**

Company Secretary

**Report by PPAP Automotive Limited for violations related to Code of Conduct under SEBI  
(Prohibition of Insider Trading) Regulations, 2015.**

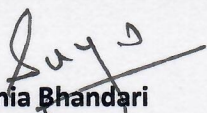
[Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details
1	Name of the listed Company	PPAP Automotive Limited
2	Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	<b>A. Details of Designated Person (DP)</b>  Violation was done by an immediate relative of a designated person as defined under Company's "Code of Conduct for Regulating, Monitoring and Reporting of Trading by Designated Persons" ("Code of Conduct").	
	i. Name of the DP	Mr. Niraj Kalra
	ii. PAN of the DP	AJCPK6047N
	iii. Designation of DP	Business Head - Non-OE Business
	iv. Functional Role of DP	Business Head - Non-OE Business
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	Mrs. Vandana Kalra
	ii. PAN of the immediate relative of DP	AZTPK9359G
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	NSE: PPAP BSE: 532934
	ii. No of shares traded and value (Rs.) (Date- wise)	Acquired 40 equity shares of PPAP Automotive Limited on or around 24 <sup>th</sup> July, 2020 aggregating to Rs. 6,400
	<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 (PIT) Regulations, 2015	Not applicable as value of Transaction is less than Rs. 10 Lacs in a calendar quarter.
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	
4	Details of violations observed under Code of Conduct	The violation was due to trade executed by the spouse of Designated Person during trading window closure period.
5	Action taken by Listed company	The Audit Committee in its meeting held on 13 <sup>th</sup> August, 2020: <ul style="list-style-type: none"> <li>advised to issue the cautionary letter to the Designated Person (DP) not to repeat such violation of the Code of Conduct in future; and</li> <li>did not levy any monetary penalty or took any disciplinary action for the violation by Designated Person (DP), as it was the first instance of violation and the trade was done inadvertently.</li> </ul>



6	Reasons recorded in writing for taking action stated above	<p>It was noted that this was the first instance of violation, wherein the immediate relative of Mr. Niraj Kalra (DP) had acquired 40 equity shares of the Company on 24<sup>th</sup> July, 2020, aggregating to Rs. 6,400 during the trading window closure period.</p> <p>On the basis of the explanation provided by Mr. Niraj Kalra (DP), it appears that he/his immediate relative was not in possession of any un-published price sensitive information and said trade was executed inadvertently during the trading window closure period.</p>																						
7	Details of the previous instances of violations, if any, since last financial year	None																						
8	If any amount collected for Code of Conduct violation(s): None																							
	i. Mode of transfer to SEBI - IPEF Online/Demand Draft)																							
	<p>ii. Details of transfer/payment</p> <p>In case of Online:</p> <table border="1" data-bbox="161 790 707 1122"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td></td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table> <p>In case of Demand Draft (DD):</p> <table border="1" data-bbox="161 1227 707 1451"> <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	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (in Rs.)		Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)	
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9	Any other relevant information	None																						

**Yours faithfully,**  
For **PPAP Automotive Limited**

  
**Sonia Bhandari**  
Company Secretary & Compliance Officer

Date: 13.08.2020

Place: Noida

PAN: AFKPG7888R

Email id.: sonia@ppapco.com