



REF: HSL/SEC/2021/52

August 13, 2021

To The Deputy Manager Department of Corporate Services BSE Ltd. PJ Towers, Dalal Street Mumbai -400001 <b>Script Code: 514043</b>	To The Manager National Stock Exchange of India Ltd. Exchange Plaza, Plot No. C/1, G Block Bandra-Kurla Complex, Bandra (E), Mumbai 400051 <b>Symbol: HIMATSEIDE</b>
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Dear Sir/Madam,

**Sub: Reporting of violations under the Code of Conduct for Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information of the Company**

**Ref: SEBI/HO/ISD/ISD/CIR/P/2020/135 circular dated July 23, 2020**

With reference to the above, please find enclosed herewith report on violation under the Code of Conduct for Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information of the Company by the Designated Persons and/or their immediate relatives.

This is for your information.

Thanking you,

Yours faithfully,  
For Himatsingka Seide Limited

A handwritten signature in black ink, appearing to read 'M. Sridhar'.

Sridhar Muthukrishnan  
Company Secretary



Encl: As above

**Himatsingka Seide Limited**

Registered Office: 10/24 Kumara Krupa Road  
High Grounds, Bangalore 560 001, India

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CIN L17112KA1985PLC006647

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**Reporting on Insider Trading violation under Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015**

Sl. No.	Particulars	Details												
1	Name of the listed company/ Intermediary/Fiduciary	Himatsingka Seide 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	<b>A. Details of Designated Person (DP)</b>													
	i. Name of the DP	Mr. Jain Jainendra Kumar												
	ii. PAN of the DP	AAWPJ7917M												
	iii. Designation of DP	Associate Vice President- TQM												
	iv. Functional Role of DP	TQM												
	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	NA												
	ii. PAN of the immediate relative of DP	NA												
	<b>C. Details of transaction(s)</b>													
	i. Name of the scrip	Himatsingka Seide Limited NSE: HIMATSEIDE BSE: 514043												
	ii. No of shares traded and value (Rs.) (Date- wise)	Purchased Equity Shares as follows: <table border="1" style="width: 100%;"> <thead> <tr> <th>Date</th> <th>Quantity</th> <th>Value per share</th> </tr> </thead> <tbody> <tr> <td>19/07/2021</td> <td>200 Shares</td> <td>Rs. 262.97</td> </tr> </tbody> </table> Sold Equity Shares as follows: <table border="1" style="width: 100%;"> <thead> <tr> <th>Date</th> <th>Quantity</th> <th>Value per share</th> </tr> </thead> <tbody> <tr> <td>29/07/2021</td> <td>200 Shares</td> <td>Rs.266.15</td> </tr> </tbody> </table>	Date	Quantity	Value per share	19/07/2021	200 Shares	Rs. 262.97	Date	Quantity	Value per share	29/07/2021	200 Shares	Rs.266.15
	Date	Quantity	Value per share											
	19/07/2021	200 Shares	Rs. 262.97											
Date	Quantity	Value per share												
29/07/2021	200 Shares	Rs.266.15												
<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	NA													

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4	Details of violations observed under Code of Conduct	DP traded during the trading window closure and also undertook contra trade.												
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Company took the following actions: i. Sought explanation in writing for the said violation ii. Warning letter being issued. iii. Profits accrued of Rs. 636/- being disgorged to the Company and the same would be transferred to SEBI -IPEF A/c.												
6	Reasons recorded in writing for taking action stated above	Warning letter being issued considering the transaction is inadvertent and venial breach as exhibited regretfully by the employee.												
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)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	To be transferred.												
	ii. Details of transfer/payment													
	In case of online: NA													
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Particulars	Details													
Bank Name and branch	-													
DD Number	-													
DD date	-													
DD amount (in Rs.)	-													
	The disgorged amount of Rs 630/- being collected from the employee. The same would be transferred to the SEBI Designated Bank Account by the Company.													
9	Any other relevant information	None												
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA												

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**Reporting on Insider Trading violation under Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015**

Sl. No.	Particulars	Details						
1	Name of the listed company/ Intermediary/Fiduciary	Himatsingka Seide 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	<b>A. Details of Designated Person (DP)</b>							
	i. Name of the DP	Mr. Nithyananda U M						
	ii. PAN of the DP	ACTPN2238A						
	iii. Designation of DP	Assistant General Manager- Engineering Process Maintenance						
	iv. Functional Role of DP	TQM						
	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	NA						
	ii. PAN of the immediate relative of DP	NA						
	<b>C. Details of transaction(s)</b>							
	i. Name of the scrip	Himatsingka Seide Limited NSE: HIMATSEIDE BSE: 514043						
	ii. No of shares traded and value (Rs.) (Date- wise)	Sold Equity Shares as follows: <table border="1" data-bbox="877 1232 1372 1332"> <thead> <tr> <th>Date</th> <th>Quantity</th> <th>Value per share</th> </tr> </thead> <tbody> <tr> <td>30/07/2021</td> <td>10 Shares</td> <td>Rs. 271.50</td> </tr> </tbody> </table>	Date	Quantity	Value per share	30/07/2021	10 Shares	Rs. 271.50
	Date	Quantity	Value per share					
	30/07/2021	10 Shares	Rs. 271.50					
<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	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	DP traded during the trading window closure period.												
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Company took the following actions: i. Sought explanation in writing for the said violation ii. Warning letter being issued.												
6	Reasons recorded in writing for taking action stated above	Warning letter being issued considering the transaction is inadvertent and minor breach as exhibited regretfully by the employee.												
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)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	<b>None</b>												
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9	Any other relevant information	None												


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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	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr. Sandeep Munnalal Agarwal
	ii. PAN of the DP	AIUPA1220G
	iii. Designation of DP	General Manager – Production Planning (Hassan)
	iv. Functional Role of DP	Production Planning
	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. Stuti Agarwal (Spouse of DP)
	ii. PAN of the immediate relative of DP	APQPA5235E
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	Himatsingka Seide Limited NSE: HIMATSEIDE BSE: 514043
	ii. No of shares traded and value (Rs.) (Date- wise)	Annexure 1
	<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 Disclosed	
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	Designated Party's immediate relative(spouse) traded in the shares of the company: i. During the trading window closure ii. Exceeding the amount of Rs 10 lacs without obtaining Pre-Clearance iii. Executed Contra Trades.

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		iv. Failed to give requisite disclosures to the company within a period of two days of the transactions.												
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Company took the following actions: i. Investigation carried out by the Company. i. Sought explanation in writing for the said violation from DP. ii. Disciplinary Action taken against the DP by issuing warning letter and suspending him for 3 days. iii. Profits of 11.91 lakhs being disgorged to the Company and the same would be transferred to SEBI -IPEF A/c.												
6	Reasons recorded in writing for taking action stated above	The Spouse of Designated Person has traded inadvertently during trading window closure period without obtaining preclearance of trade.												
7	Details of the previous instances of violations, if any, since last financial year	During the investigations it has come to light that the spouse of the DP has been trading in shares of the company from the year 2017.												
8	If any amount collected for Code of Conduct violation(s)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	To be transferred.												
	ii. Details of transfer/payment													
	In case of online: NA													
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Particulars	Details													
Bank Name and branch	-													
DD Number	-													
DD date	-													
DD amount (in Rs.)	-													

	The disgorged amount of Rs 11,91,267/- being collected from the employee. The same would be transferred to the SEBI Designated Bank Account by the Company.	
<b>9</b>	Any other relevant information	None

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**Annexure 1**

Date	No of Shares bought	No of Shares sold	Purchase Price	Sale Price
2017-08-23	1000	-	306.00	-
2017-08-30	-	500	-	325.24
2017-08-31	-	500	-	335.00
2017-11-22	300	-	329.44	-
2017-12-08	-	300	-	333.75
2019-08-22	1000	-	124.20	-
2019-08-27	-	1000	-	128.65
2019-10-18	1000	-	144.44	-
2019-10-22	1000	-	146.61	-
2019-10-23	-	1000	-	150.02
2019-10-24	-	1000	-	161.74
2019-10-25	500	-	151.74	-
2019-10-31	-	500	-	155.43
2019-11-13	1000	-	134.45	-
2019-11-22	2500	-	136.33	-
2019-11-28	569	-	131.00	-
2019-11-29	-	569	-	133.88
2019-12-03	500	-	130.00	-
2019-12-04	500	-	128.00	-
2019-12-12	500	468	122.00	123.45
2019-12-16	800	-	120.48	-
2019-12-17	-	332	-	122.56
2019-12-26	-	500	-	123.70
2020-01-02	-	3000	-	131.13
2020-01-09	-	1500	-	128.17
2020-02-06	1000	-	127.25	-
2020-02-12	1000	-	99.63	-
2020-02-13	-	1000	-	103.30
2020-02-20	500	500	100.87	106.21
2020-03-05	1000	-	91.01	-
2020-04-23	1000	-	58.00	-
2020-05-07	1000	-	49.66	-
2020-05-14	1000	-	48.00	-
2020-05-15	-	1000	-	51.92

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2020-05-19	1000	-	46.00	-
2020-05-26	1000	-	45.84	-
2020-06-02	-	1000	-	47.56
2020-06-04	4000	4000	50.40	51.00
2020-06-05	4000	-	55.90	-
2020-06-09	-	2000	-	62.41
2020-06-18	-	4000	-	63.75
2020-08-06	-	2000	-	68.61
2020-08-11	-	1000	-	82.11
2020-08-21	1000	-	88.00	-
2020-08-31	15000	-	82.72	-
2020-11-09	-	16000	-	120.50
2020-12-03	7000	-	129.14	-
2020-12-07	-	5000	-	135.43
2020-12-09	-	2000	-	138.89
2020-12-10	2000	-	135.05	-
2020-12-11	-	2000	-	142.96
2020-12-15	7000	-	144.66	-
2020-12-16	-	7000	-	148.02
2020-12-18	2500	2500	144.95	146.45
2020-12-23	3000	-	144.61	-
2021-02-09	-	3000	-	150.86
2021-02-23	6000	-	156.33	-
2021-02-25	-	6000	-	160.85
2021-03-09	5000	5000	161.28	164.76
2021-03-17	5000	-	161.81	-
2021-03-19	3000	-	147.46	-
2021-06-04	5000	-	169.21	-
2021-06-08	-	3000	-	176.54
2021-06-09	5000	-	171.86	-
2021-06-10	-	3000	-	174.60
2021-06-14	3000	-	171.06	-
2021-06-17	-	15000	-	181.62
2021-06-18	2000	-	177.38	-
2021-06-21	5000	-	178.40	-
2021-06-23	-	7000	-	188.84
<b>Grand Total</b>	<b>104169</b>	<b>104169</b>		

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