



Bansal Wire Industries Limited

Manufacturers of Steel Wires

Date: 04.09.2024

To
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G
Bandra Kurla Complex
Bandra (E), Mumbai – 400 051

To
BSE LIMITED
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai – 400 001

Trading Symbol: BANSALWIRE

Scrip Code: 544209

Sub.: Reporting to Stock Exchanges regarding violation under SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct (COC)

Ref.: SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020

Madam/Sir,

We refer to the captioned subject and enclose herewith the report by the Company for the violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the format of Annexure-A as prescribed by the SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Please take the same on record.

Thanking you,

Yours faithfully,

For Bansal Wire Industries Limited

Sumit Gupta
Company Secretary
And Compliance Officer

Encl.: As Above

Annexure - A

Report by Bansal Wire Industries 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

S.No.	Particulars	Details			
1.	Name of the listed company/ Intermediary/Fiduciary	Bansal Wire Industries Limited			
2.	<i>Please tick appropriate checkbox</i> 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	Ruchi Gupta			
	ii. PAN of the DP	AGXPG5744N			
	iii. Designation of DP	Not applicable			
	iv. Functional Role of DP	Not Applicable			
	v. Whether DP is Promoter or belongs to Promoter Group	Yes. DP belongs to the Promoter Group Individual of the Company.			
	B. If Reporting is for immediate relative of DP				
	i. Name of the immediate relative of DP	Arun Gupta, Chairman and Whole Time Director, Promoter (Father) Anita Gupta, Promoter (Mother) Pranav Bansal, Managing Director and CEO, Promoter (Brother)			
	ii. PAN of the immediate relative of DP	Arun Gupta-AETPG0551K Anita Gupta-AEXPG0847C Pranav Bansal- BMWPB8108H			
	C. Details of transaction(s)				
	i. Name of the scrip	Bansal Wire Industries Limited NSE - BANSALWIRE BSE - 544209			
	ii. No of shares traded and value (Rs.) (Date- wise)	Date	Transaction	No of Shares	Value (Rs.)
		15.07.2024	BUY	17000	60,13,002
		19.07.2024	BUY	6339	21,91,329
22.07.2024		BUY	3661	12,54,353	
13.08.2024		BUY	1490	5,15,078	

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	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	Purchased Equity Shares of the Company during the trading window closure period. (Trading window was closed from 10 th July, 2024 till the completion of 48 hours after declaration of the Audited Financial Results for the quarter ended June 30, 2024)
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The Company by its letter to Ruchi Gupta directed her to pay a monetary penalty of Rs. 50,000/- (Rupees Fifty Thousand only) and asked her to ensure that no further trading/contra-trading/dealing in shares of the Company will be done by her for a period of six months from the end of the month in which the purchase of shares was made.</p> <p>Further, she has also been advised to strictly comply with the Insider Trading Regulations and the subject Code of Conduct of the Company and ensure that the same is not to be violated by her in future and warned that any non-compliance would result in stringent disciplinary action.</p>
6	Reasons recorded in writing for taking action stated above	The DP is a part of the 'Promoter Group' of the Company. Notwithstanding the above, the DP is neither involved in any of the decisions of the Company nor takes part in control of any affairs of the Company and is a DP since she is a relative of the promoters. As submitted by her, the purchase of shares by her during the period of closure of Trading Window was entirely inadvertent. However, the same is a violation in terms of the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and considering all aspects including her submission that she was inadvertently not aware of the closure of Trading window and the purchase at such time was unintentional and also the fact that it is the first case of violation, the Company has taken the aforesaid action.
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	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online

ii. Details of transfer/payment

In case of Online:

Particulars	Details
Name of the transferor	Bansal Wire Industries Limited
Bank Name, branch and Account number	Canara Bank, Ashok Vihar, Delhi, Account No. 0271261004762
UTR/Transaction reference Number	240904195986058
Transaction date	04.09.2024

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

Ruchi Gupta by her letter dated 04.09.2024 has informed that she has deposited amount of Rs. 50,000/- through net banking on 03rd September, 2024 as penalty in Company's account. Which was further deposited by the Company in SEBI Protection and Education Fund on 04th September, 2024 through net banking (Transaction Id: 240904195986058).

Ruchi Gupta has also confirmed that the said purchase was an inadvertent trade made without intent to violate the Company's Insider Trading Policy or the SEBI (Prohibition of Insider Trading) Regulations, 2015 and also she was not in possession of any Unpublished Price Sensitive Information (UPSI) of the Company while making the aforesaid purchase of shares.