

August 05, 2022

<b>National Stock Exchange of India Ltd.,</b>  Exchange Plaza, C-1 Block G, Bandra Kurla Complex Bandra [E], Mumbai – 400051	<b>BSE Ltd.,</b>  Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001	<b>Metropolitan Stock Exchange of India Ltd.,</b>  Vibgyor Towers, 4 <sup>th</sup> Floor, Plot No. C62, G - Block, Opp. Trident Hotel, Bandra Kurla, Complex, Bandra (E), Mumbai – 400098
NSE Scrip Symbol: BLS	BSE Scrip Code: 540073	MSE Scrip Symbol: BLS

Dear Sir/Madam,

**Sub: Update on violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

This is in continues announcement of our earlier reporting on the captioned subject submitted by the Company on 19 May, 2022, and on 25 May, 2022, wherein the Company has submitted the events of violation of the Code of Conduct under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

We wish to inform you that the Audit Committee of the Company, at their meeting held today, has taken a note of the said reported violation related to Code of Conduct under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. Disclosure pertaining to update on the matter enclosed as **Annexure A**.

You are requested to take the same on record.

For **BLS International Services Limited**

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**Dharak A. Mehta**  
**Company Secretary and Compliance Officer**  
**ICSI Membership No.: ACS40502**

Encl: as above

### Annexure A

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015  
For Intermediaries/ Fiduciaries: Schedule C read with Regulation 9(1) and 9(2) of SEBI(Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details	Details
1.	Name of the listed company/ <del>Intermediary/</del> Fiduciary	BLS INTERNATIONAL SERVICES LIMITED	
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary		
3.	<b>A. Details of Designated Person (DP)</b>		
	i. Name of the DP	Mr. Gautam Aggarwal	Mr. Amit Sudhakar
	ii. PAN of the DP	AGRPA7160J	AGLPS9163K
	iii. Designation of DP	Chief Human Resource Officer	Chief Financial Officer
	iv. Functional Role of DP	Strategic HR and HR Operations	Accounts and Finance
	v. Whether DP is Promoter or belongs to Promoter Group	No	No
	<b>B. If Reporting is for immediate relative of DP</b>		
	i. Name of the immediate relative of DP	N.A.	N.A.
	ii. PAN of the immediate relative of DP	N.A.	N.A.

<b>C. Details of transaction(s)</b>		
i. Name of the scrip	<b>BLS / 540073</b>	<b>BLS / 540073</b>
ii. No of shares traded and value (Rs.) (Date - wise)	<b>18.05.2022</b> – Sold 13,000 equity shares for Rs. 23,91,437/-	<b>24.05.2022</b> – Sold 300 equity shares for Rs. 57,120/-
	<b>18.05.2022</b> – Purchased 1000 equity shares for Rs. 1,84,579/-	<b>24.05.2022</b> – Purchased 300 equity shares for Rs. 56,772/-
	<b>18.05.2022</b> – Sold 3,000 equity shares for Rs. 5,63,000/-	<b>25.05.2022</b> – Sold 300 equity shares for Rs. 58,644/- (approx.)
<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	19.05.2022	N.A
ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	19.05.2022	N.A
4. Details of violations observed under Code of Conduct	Mr. Gautam Aggarwal has sold 13,000 equity shares of the company on 18 May, 2022. Further he Purchased 1000 equity shares on Same date (i.e. within a period of Six months) and Sold 3000 equity shares of the company on same date i.e. May 18.05.2022.	Mr. Amit Sudhakar has sold 300 equity shares of the company on 24 May, 2022. Further he Purchased 300 equity shares on Same date (i.e. within a period of Six months) and further sold the said 300 equity shares of the company on 25 May, 2022.

		The Code of Conduct provides that a Designated Person/his Immediate Relative cannot enter into opposite transaction within six months of a prior transaction.	The Code of Conduct provides that a Designated Person/his Immediate Relative cannot enter into opposite transaction within six months of a prior transaction.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	<p>Profit earned by Designated Person of Rs. 4,379/- has been has been deposited in SEBI IEPF Account.</p> <p>Warning letter has been issued to the Designated Person that he would not engage in any kind of dealings in the Equity Shares of the Company which is in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and also ensure the compliance of the same by his immediate relatives and dependents.</p> <p>The designated person has also been provided again with a copy of Code of Conduct along with presentation on compliance of SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	<p>Profit earned by Designated Person of Rs. 2,220/- has been has been deposited in SEBI IEPF Account.</p> <p>Warning letter has been issued to the Designated Person that he would not engage in any kind of dealings in the Equity Shares of the Company which is in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and also ensure the compliance of the same by his immediate relatives and dependents.</p> <p>The designated person has also been provided again with a copy of Code of Conduct along with presentation on compliance of SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>
6.	Reasons recorded in writing for taking action stated above	The action stated above was taken after considering the fact that first instance of inadvertent violation made by DP erroneously in placing the order on exchange.	The action stated above was taken after considering the fact that first instance of inadvertent violation made by DP erroneously in placing the order on exchange.

7.	Details of the previous instances of violations, if any, since last financial year	N.A.	N.A.																		
8.	If any amount collected for Code of Conduct violation(s)	The DP has deposited Rs. 4,379/- in SEBI IEPF Account	The DP has deposited Rs. 2,220/- in SEBI IEPF Account																		
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online transfer	Online transfer																		
	ii. Details of transfer/payment in case of Online:																				
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