



Department of Corporate Services, BSE Limited, 14<sup>th</sup> Floor, P.J. Towers, Dalal Street, MUMBAI – 400 001

Listing Department,
National Stock Exchange of India Ltd,
"Exchange Plaza",
Bandra-Kurla Complex, Bandra (East)
MUMBAI - 400 051

(BSE Scrip Code No.502330)

(Symbol - ANDHRAPAP Series -EQ)

Dear Sir,

Sub: Reporting under SEBI (Prohibition of Insider Trading) Regulations, 2015 Ref: Violation of Company's Insider Trading Rules

We herewith submit the report on action taken by the Company for violation of code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 read with SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Please take on record the intimation annexed to this letter pursuant to Schedule B read with Regulation 9 (I) of Regulations of SEBI (Prohibition of insider Trading) Regulations, 2015 and other applicable circulars I guidelines issued by SEBI in this regard.

Thanking you,

Yours faithfully, For ANDHRA PAPER LIMITED

ARAYIND MATTA
COMPANY SECRETARY &
VICE PRESIDENT (CORPORATE AFFAIRS)

Encl: As above



### ANDHRA PAPER LIMITED

(Formerly known as International Paper APPM Limited) (Corporate Identity Number: L21010AP1964PLC001008)

Regd. Office: Rajahmundry – 533 105, East Godavari District, Andhra Pradesh, India. Corp. Office: 8<sup>th</sup> Floor, Krishe Sapphire Building, 1-89/3/B40 to 42/KS/801, Hitec City Main Road, Madhapur, Hyderabad - 500 081

Tel: +91-40-6810-1200 Fax: +91-40-6810-1255

Website: www.andhrapaper.com

An ISO 9001, ISO 14001, ISO 45001 and FSC\* Certified Company (FSC\* - C119477)



# Report by Andhra Paper 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/	ANDHRA PAPER LIMITED
	Intermediary/Fiduciary	(Formerly known as International Paper
		APPM Limited)
2	Please tick appropriate checkbox	Listed Company
	Reporting in capacity of :	
· 	√ Listed Company	
	☐ Intermediary	
	☐ Fiduciary	
3	A. Details of Designated Person (DP) -	NOT APPLICABLE
	i Name of the DP	
	ii PAN of the DP	
	iii Designation of DP	
	iv Functional Role of DP	
	v Whether DP is Promoter or belongs to	
	Promoter Group	. :
	B. If Reporting is for immediate relative of	1
	i. Name of the immediate relative of DP	Ms. Kamini Sarin, immediate relative
		(Spouse) of Mr. Adhiraj Sarin, Independent
		Director and Designated Person of the
		Company
	ii. PAN of the immediate relative of DP	AOBPS8730A
	C. Details of transaction(s)	
	i. Name of the scrip	BSE Code: 502330
		NSE Symbol: ANDHRAPAP
	ii. No. of shares traded and value (Rs.)	a) <b>Sold</b> 1,237 shares on 09.10.2020 for
	(Date- wise)	Rs. 2,36,401.38; and
	4	b) <b>Sold</b> 1,263 shares on 15.10.2020 for
		Rs. 2,33,990.61

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	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  ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	Details of violations observed under Code of Conduct	Execution of Contra trade by Ms. Kamini Sarin, immediate relative (Spouse) of Mr. Adhiraj Sarin, Independent Director and Designated Person of the Company, during the trading window closure period
5	Action taken by Listed company <del>/</del> Intermediary/ Fiduciary	On the recommendation of Audit Committee and the Board, the Company initiated the following actions —  a) issued a caution notice to the DP b) collected 5% of the total sale proceeds of the shares as penalty
6	Reasons recorded in writing for taking action stated above	As this was the first instance of violation and though the traded quantity was less and was transacted at net loss, in order to pass a very strong message to all Designated Persons, to up-keep the compliance culture of the Company and also to avoid the recurrence of noncompliances, a penalty is levied for the violation.
7	Details of the previous instances of violations, if any, since last financial year	Nil

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8	If any any and called to deep Code of Conduct violation (a)		
8	If any amount collected for Code of Condu	` ,	
	i. Mode of transfer to SEBI - IPEF	Online	
	(Online/Demand Draft)		
	ii. Details of transfer/payment		
	In case of online:		
	Name of the transferor	Andhra Paper Limited	
	Bank Name, branch and Account number	HDFC Bank, Bank House, Banjara Hills,	
		Road No. 1, Hyderabad – 500 034	
		Account No. 57500000368280	
	UTR/Transaction reference Number	N310201298488869	
	Transaction date	05/11/2020	
	Transaction Amount (in Rs.)	23,600	
9	Any other relevant information	The amount has been transferred to SEBI -	
		IPEF account maintained at Bank of India,	
		Bandra Kurla Complex (BKC), (Account	
		Number: 012210210000008, IFSC Code:	
		BKID0000122) on November 4, 2020 in	
		compliance with in SEBI circular No. SEBI/	
		HO/ISD/ISD/CIR/P/2020/135 dated July 23,	
		2020.	

Date: November 6, 2020

Place: Hyderabad

For ANDHRA PAPER LIMITED

COMPANY SECRETARY &

**VICE PRESIDENT (CORPORATE AFFAIRS)** 

PAN: ATMPM6592Q

E-Mail id: aravind.matta@andhrapaper.com

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