

Registered Office: Construction House, 5, Walchand Hirachand Road, Ballard Estate, Mumbai - 400 001. INDIA Tel.: +91-22-22618091, +91-22-40748181 • Fax: +91-22-22656863 • E-mail: info@indianhumepipe.com • Visit us at: www.indianhumepipe.com CIN: L51500MH1926PLC001255

HP/SEC/

25th February, 2021

1. BSE Ltd.

Corporate Relationship Department, 1<sup>st</sup> Floor, New Trading Ring, Rotunda Building, P. J. Towers, Dalal Street, Fort, Mumbai - 400 001

BSE Scrip Code: 504741

2. National Stock Exchange of India Ltd. Exchange Plaza, 5<sup>th</sup> floor, Plot No. C/1, G Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400 051

Symbol – INDIANHUME; Series EQ

Dear Sirs,

Sub: Reporting under SEBI (Prohibition of Insider Trading) Regulations, 2015 Re: Violation of the Company's Code of Conduct

This is to inform you that in terms of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Code of Conduct of The Indian Hume Pipe Company Limited and SEBI Circular No.

SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation by the Designated Person along with the action taken by the Company thereon is enclosed as "**Annexure A**" to this letter.

We request you kindly take the above on record.

Thanking you,

Yours faithfully, For The Indian Hume Pipe Company Limited,



S. M. Mandke Company Secretary FCS-2723

Encl: As above.



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#### **ANNEXURE-A**

25th February, 2021

Report by The Indian Hume Pipe Company Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[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				
1	Name of the listed company/ Intermediary/ Fiduciary	The Indian Hume Pipe Co. Ltd.				
2	Please tick appropriate checkbox Reporting in capacity of : □ Listed Company □ Intermediary □ Fiduciary	Listed Company				
3	A. Details of Designated Person (DP)					
	i. Name of the DP	Mr. Prabhakar S. Raut				
	ii. PAN of the DP	AAGPR6636K				
	iii. Designation of DP	Executive Assistant				
	i. Functional Role of DP	Executive Assistant to Executive Director				
	Whether DP is Promoter or belongs to promoter Group	No				
	B. If Reporting is for immediate relative of DP					
	i. Name of the immediate relative of DP	Not applicable				
	ii. PAN of the immediate relative of DP					
	C. Details of transaction(s)					
	iii. Name of the scrip	The Indian Hume Pipe Co. Ltd.				
	iv. No of shares traded and value (Rs.) (Date-wise)	1) 50 Shares purchased on 22-05-2020 for Rs.7066.61 (Trading Window Closure-TWC) 2) 50 Shares sold on 23-06-2020 for Rs.8148.67 (TWC and Contra) and 3) 50 Shares sold on 19-11-2020 for Rs.9034.54 (Contra).				
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter					





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Sr.	Danies Israe		Detaile	
No.	Particulars	Details		
	V. Date of intimation of trade(s) byconcerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015		N.A.	
	V. Date of intimation of trade(s) by Compa to stock exchanges under regulation 7 of SEBI(PIT) Regulations, 2015	•	N.A.	
4	Details of violations observed under Code of Conduct		Trading window closure & Contra trades	
5	Action taken by Listed company/ Intermediary/ Fiduciary		Remitted Rs.4,315/- towards profit and Rs.5000/- towards penalty. Total Rs.9,315/- to SEBI - IPEF Board	
6	Reasons recorded in writing for taking action		Inadvertently traded	
7	Details of the previous instances of violatio	ns,	None	
	if any, since last financial year			
8				
	i. Mode of transfer to SEBI - IPEF			
	ii. Details of transfer/payment In case of	nline:		
	Particulars	D		
	Name of the transferor		Prabhakar S. Raut	
	Bank Name, branch and Account number		HDFC Bank Ltd., Rigal Cinema Bldg, Colaba Branch, A/c No.50100148869684, IFSC code: HDFC0000085	
	UTR/Transaction reference Number		N055211417230723	
	Transaction date		24-02-2021	
	Transaction Amount (in Rs.)		Rs.9315/-	
	In case of Demand Draft (DD):			
	Particulars	D		
	Bank Name and branch			
	DD Number			
	DD date			
	DD amount (in Rs.)			
9	Any other relevant information			





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# Report by The Indian Hume Pipe Company Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[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		
1	Name o	f the listed company/ Intermediary/ Fiduciary	The Indian Hume Pipe Co. Ltd.		
2	Please tick appropriate checkbox Reporting in capacity of :  ☐ Listed Company ☐ Intermediary ☐ Fiduciary		Listed Company		
3	A. Details of Designated Person (DP)				
	i.	Name of the DP	Mr. Ashok B. Joshi		
	ii.	PAN of the DP	ABSPJ9721G		
	iii.	Designation of DP	General Manager-HR		
	i.	Functional Role of DP	HR head		
	Whethe Group	r DP is Promoter or belongs to promoter	No		
	B. If Reporting is for immediate relative of DP				
	i.	Name of the immediate relative of DP	Not applicable		
	ii.	PAN of the immediate relative of DP			
	C. Details of transaction(s)				
	iii.	Name of the scrip	The Indian Hume Pipe Co. Ltd.		
			900 Shares sold on 31-08-2020 for Rs.1,71,353.79 (loss of Rs.5,973.21) (Contra and TWC)		
	iv. No of	f shares traded and value (Rs.) (Date-wise)			
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter				





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Sr. No.	Particulars		Details			
	iv. Date of intimation of trade(s) byconcerned DP/ direct promoter/ promoter group to Compa under regulation 7 of SEBI (P Regulations, 2015	any	N.A.			
	V. Date of intimation of trade(s) by Compa to stock exchanges under regulation 7 of SEBI(PIT) Regulations, 2015		N.A.			
4	Details of violations observed under Code of Conduct		Contra trade & TWC			
5	Action taken by Listed company/ Intermediary/ Fiduciary		DP has informed he has not made any profit on sale of 900 shares hence warning given and directed to deposit penalty of Rs.2000/- to SEBI – IPEF Board.			
6	Reasons recorded in writing for taking action stated above		Exigency and inadvertently traded			
7	Details of the previous instances of violations, if any, since last financial year		None			
8	8 If any amount collected for Code of Conduct violation(s)					
	i. Mode of transfer to SEBI - IPEF					
	ii. Details of transfer/payment In case of	nline:				
	Particulars	D				
	Name of the transferor		Mr. Ashok B. Joshi			
	Bank Name, branch and Account number		Dombivali Nagarik Sahakari Bank, Main Branch, Dombivali, A/c No.002010100051917			
	UTR/Transaction reference Number		DNSBN21056407334			
	Transaction date		25-02-2021			
	Transaction Amount (in Rs.)		Rs.2000/-			
	In case of Demand Draft (DD):					
	Particulars	D				
	Bank Name and branch					
	DD Number					
	DD date					
	DD amount (in Rs.)					
9	Any other relevant information					



Yours faithfully, For The Indian Hume Pipe Co. Ltd.

S. M. Mandke Company Secretary & Compliance Officer Email-id smm@indianhumepipe.com

Date: 25-02-2021 Place: Mumbai