

To  
BSE Limited  
Listing Department  
25<sup>th</sup> Floor, P J Towers,  
Dalal Street,  
Mumbai – 400 001  
Scrip Code: 505368

Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1 Block G,  
Bandra Kurla Complex, Bandra, East Mumbai –  
400 051.  
Scrip Code: REVATHI

Dear Sir/Madam,

04th September, 2020

**Sub: Submission of Report for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.**

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We wish to inform you that, the details of the violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 as required pursuant to SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23rd July, 2020 has been attached herewith as a report.

Kindly take the same on record.

Yours faithfully,

**For Revathi Equipment Limited**



**K Maheswaran**  
**Company Secretary & Compliance Officer**

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**Revathi Equipment Limited**

331, Pollachi Road, Coimbatore - 641 050. India. Phone : 0422 - 2610851, 0422 - 6655100, Fax : 0422 - 6655199 CIN No.: L29120TZ1977PLC000780 E-mail: spares@revathi.in Website:

www.revathi.com

**Report by Revathi Equipment Limited (listed company) 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]

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Revathi Equipment 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.Kishore Nanik Sidhwani
	ii. PAN of the DP	AKHPS1090B
	iii. Designation of DP	Independent Director
	iv. Functional Role of DP	The DP is an Independent Director of the Company and does not have any functional role in the company
	v. Whether DP is Promoter or belongs to Promoter Group	No, is not a promoter or belongs to the promoter group
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	Revathi Equipment Limited
	ii. No of shares traded and value (Rs.) (Date-wise)	400 equity shares were purchased for a total consideration of Rs. 1,58,036/- during the period from 31 <sup>st</sup> July 2020 to 7 <sup>th</sup> August 2020.
	<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 Applicable as the traded value is less than Rs.10 lacs in the calendar quarter.

	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable as the traded value is less than Rs.10 lacs in the calendar quarter
4	Details of violations observed under Code of Conduct	Mr.Kishore Nanik Sidhwani had acquired 400 equity shares of the Company in the open market on the stock exchanges during the period from 31 <sup>st</sup> July 2020 to 7 <sup>th</sup> August 2020, when the trading window of the Company was closed for trading by designated persons and had not made any application to the Company to obtain pre-clearance from the Compliance Officer of the Company for trading in the equity shares of the company in the open market.
5	Action taken by Listed company/ <del>Intermediary/</del> Fiduciary	<p>The Compliance Officer of the Company had issued a Show Cause Notice dated 12<sup>th</sup> August, 2020 to Mr.Kishore Nanik Sidhwani for the violation of the Code of Conduct pursuant to which a reply was received from him on 13<sup>th</sup> August, 2020.</p> <p>The matter was then reported to the Audit Committee which confirmed the violation of Code of Conduct formulated pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 by Mr.Kishore Nanik Sidhwani and recommended a penalty of Rs.5,000/-.</p> <p>Subsequently, the Board of Directors of the Company on the recommendation of the audit committee approved and levied a penalty of Rs.5,000/- on Mr.Kishore Nanik Sidhwani.</p>
6	Reasons recorded in writing for taking action stated above	Considering the facts and circumstances of the case of default by Mr.Kishore Nanik Sidhwani, the Company imposed a penalty of Rs.5,000/- for violation of the Code of Conduct formulated pursuant to Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

		The Audit Committee & the Board of Directors were of the opinion that the penalty is commensurate with the aforesaid violation as detailed in point 4 above.
7	Details of the previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	<del>Demand Draft</del> /Online - NEFT Transfer
	<b>ii. Details of transfer/payment</b>	
	<b>In case of Online:</b>	
	<b>Particulars</b>	<b>Details</b>
	Name of the transferor	Revathi Equipment Limited
	Bank Name, branch and Account number	State Bank of India, SME Branch Kurichi, and A/c no. 10496077100
	UTR/Transaction reference Number	SBIN220234007382
	Transaction date	21.08.2020
	Transaction Amount (in Rs.)	Rs.5,000/-
9	Any other relevant information	Nil

Date 04.09.2020  
Place: Coimbatore

Yours faithfully,  
For Revathi Equipment Limited



**K Maheswaran**  
Compliance Officer  
PAN: AZBPM3483B  
Email ID: compliance.officer@revathi.in