

## **Andern** Insulators Limited

Registered Office: Talheti, Village: Karoli, Tehsil: Abu Road

District : Sirohi - 307510 (Rajasthan) India

Phone: 02974-228044 to 228047, Fax: 02974-228043 www.moderninsulators.com CIN- L31300RJ1982PLC002460

Email: compliance@moderninsulators.com

Date: - 02/02/2021

BSE Ltd.

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

Dear Sir,

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

This is to inform you that in terms of the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of the code of conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015 by the Designated Person along with the action taken by the Company thereon is enclosed as "Annexure A" to this letter. Further, the reported deviation is not material in relation to the total paid up equity share capital of the Company.

Kindly take the same on record.

Thanking you

Yours Faithfully

For Modern Insulators Limited

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Gauray Goyal Company Secretary & Compliance Officer

Encl: As Above

Works: Insulators Division : Talheti, Village: Karoli, Tehsil: Abu Road, District: Sirohi - 307510 (Rajasthan) India Terry Towels Division: P.B. No. 16, Sanand-382110, Dist. Ahmedabad Tel.:02717-222373, Fax: 02717-222367

## Annexure -A

## Report by Modern Insulators 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.	Par	ticulars	Details	
1	Name of the listed company/ Intermediary/Fiduciary		Modern Insulators Limited	
2	Please tick appropriate checkbox Reporting in capacity of :  Listed Company Intermediary Fiduciary			
3	A. Details of Designated Person (DP)			
	i.	Name of the DP	Ajaymeru Trading & Investments Pvt. Ltd.	
	ii.	PAN of the DP	AAACA4235G	
	iii.	Designation of DP	Promoter group	
	iv.	Functional Role of DP	DP does not have any functional role in the Company	
	V.	Whether DP is Promoter or belongs to Promoter Group	Yes, belongs to promoter group	
	B. If Reporting is for immediate relative of DP			
	i.	Name of the immediate relative of DP	NA	
	ii.	PAN of the immediate relative of DP	NA	
	C. Details of transaction(s)			
	i.	Name of the scrip	Modern Insulators Limited	
	ii.	No of shares traded and value (Rs.) (Date- wise)	50000 equity shares were purchased for total consideration of Rs. 3160000/- on 28/01/2021	
	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	29/01/2021	
	ii.	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	30/01/2021	



4	Details of violations observ Conduct	ed under Code of	Ajaymeru Trading and Investments Pvt. Ltd. has purchased 50000 equity shares of the Company in the open market on the stock exchanges on 28/01/2021, 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 preclearance from the compliance officer for trading in the equity shares of the company in the open market.
5	Action taken by Listed com Fiduciary	npany/ Intermediary/	A warning letter is issued to the Directors of Ajaymeru Trading & Investments Pvt. Ltd for strictly adhering to the Code of Conduct for prevention of Insider Trading to avoid situations where the Company can take strict disciplinary action in case of re-occurrence of the event.
6	Reasons recorded in writin stated above	g for taking action	Considering the explanation received from Promoters that said transaction was not done intentionally and happened mistakenly as well as looking to the materiality of transaction and aforesaid violation being first transgression of the Code of Conduct for prevention of Insider Trading of the Company, a warning letter has been issued.
7	Details of the previous instances of violations, if any, since last financial year		No
8	If any amount collected for	r Code of Conduct vio	plation(s)
	i. Mode of transfer to SEBI (Online/Demand Draft)	– IPEF	NA
	ii. Details of transfer/payme In case of Demand Draft (I		NA
	Particulars	Details	
	Bank Name and branch		
	DD Number		
	DD date		
	DD amount (in Rs.)		
9	Any other relevant information	tion	None

Abu Road

Gauray Goyal Company Secretary & Compliance officer

Date: - 02/02/2021 Place: - Abu Road