

To,
The Secretary,
Listing Department
BSE Limited
P.J Towers, Dalal Street, Fort,
Mumbai - 400 001

Scrip Code: 531723 / 570005

To,
The Manager,
Listing Department,
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor, Plot No. C/1, G
Block Bandra-Kurla Complex, Bandra (E),
Mumbai-400051, Maharashtra.

Symbol: STAMPEDE / SCAPDVR

Subject: Reporting Violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations 2015.

Reference: SEBI Circular No. SEBI/HO/ISD/CIR/P /2020/135 dated July 23, 2020


Dear Sir / Madam,

In furtherance to the captioned subject and reference, please find enclosed herewith the report in the prescribed form hereto marked and annexed as **Annexure - A** under SEBI (Prohibition of Insider Trading) Regulations, 2015 by the Company containing details of violation by Designated Person by dealing in Equity Shares with Differential Voting Rights of the Company.

We request you to take the above on your record.

Thanking You,
Yours faithfully,

For and on behalf of Stampede Capital Limited


Mr. Srinivas Maya
Whole Time Director and Compliance Officer

Date : August 13, 2021

Place : Hyderabad

Encl : a/a

Annexure - A

Report by Stampede Capital Limited (Company) for violations related to code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 (SEBI PIT Regulations, 2015).

Sr. No.	Particulars	DETAILS
1	Name of the listed Company/Intermediary/Fiduciary	Stampede Capital Limited
2	Please tick appropriate check box Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	A. Details of Designated Person(DP)	
	i. Name of the DP	Gayi Adi Holdings Private Limited (Formerly known as GayiAdi Management and Trends Private Limited)
	ii. PAN of the DP	AAHCG3348M
	iii. Designation of DP	Promoter
	iv. Functional Role of DP	-
	v. Whether DP is Promoter or belongs to Promoter Group	Yes
	B. If Reporting is for immediate relative of DP: N.A.	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	C. Details of transaction(s)	
	i. Name of the scrip	Equity Shares with Differential Voting Right (DVR Shares) of Stampede Capital Limited
ii. No of share traded and value(Rs.)(Date-wise)	A. Sold 4,78,574 DVR Shares on August 06, 2021@ Rs. 3/- Per shares B. Sold 5,24,290 DVR Shares on August 06, 2021@ Rs. 3.15/- Per shares	
C. In case value of trade(s) is more than Rs.10 Lakhs in a calendar Quarter: Yes		


	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	August 10, 2021
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of (SEBI PIT Regulations, 2015)	August 12, 2021
4	Details of violations observed under Code of Conduct	<p>A. Sold 4,78,574 DVR Shares on August 06, 2021@ Rs. 3/- Per shares when the trading window was closed.</p> <p>B. Sold 5,24,290 DVR Shares on August 06, 2021@ Rs. 3.15/- Per shares when the trading window was closed.</p>
5	Action taken by Listed company/Intermediary/Fiduciary	<p>Pursuant to the provision of (SEBI PIT Regulations, 2015), The violation as disclosed above was placed before the Audit Committee of the Company in its meeting held on August 10, 2021. The Audit Committee pursued the violation and resolved that:</p> <p>A. A warning letter be issued by the Company to Gayi Adi Holdings Private Limited (Formerly known as <i>GayiAdi Management and Trends Private Limited</i>), Designated Person of the Company that it would not be engaged in any kind of dealings in the Equity Shares of the Company which shall be in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> <p>B. A warning letter be issued by the Company to Gayi Adi Holdings Private Limited to be extra cautious while executing transactions in the future and ensure compliance of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and in case of any subsequent violation stricter action(s) will be taken by the Company.</p> <p>C. A monetary penalty of Rs. 20,000/ (Rupees Twenty Thousand Only) be levied on the said violation.</p>

6	Reasons recorded in writing for taking action stated above	<p>On August 10, 2021, it was brought to the attention of the Compliance Officer of the Company that Gayi Adi Holdings Private Limited, Designated Person of Stampede Capital Limited, had inadvertently, through its Stock Broker, sold 4,78,574 DVR shares on August 06, 2021, @ Rs. 3/- Per DVR share and sold 5,24,290 DVR shares on August 06, 2021, @ Rs. 3.15/- Per DVR share without obtaining pre-clearance of trade ("Trade"). The Trade occurred when the trading window was closed.</p> <p>The Trade was carried out by the Stock Broker without the knowledge of Gayi Adi Holdings Private Limited. In Stock Broker services, the investor does not generally monitor the day-to-day investment decisions. In this case as well, Gayi Adi Holdings Private Limited had given no instruction to conduct the Trade and it also had no knowledge of the Trade having occurred. The Stock Broker unilaterally took the decision to conduct the Trade.</p> <p>The Audit Committee of the Company's Board of Directors, which is responsible for the review of compliance with the Insider Trading Policy of the Company was notified of this matter. Based on the submission of Gayi Adi Holdings Private Limited, the Audit Committee believes, that this was an inadvertent Trade made without intent to violate the Company's Insider Trading Policy or the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations").</p> <p>However, the Audit Committee has determined that there was a violation of the Company's Insider Trading Policy and the PIT Regulations and therefore a penalty must be imposed on Gayi Adi Holdings Private Limited.</p>
7	Details of the previous instances of violations, if any, since last financial year	NA
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI-	The penalty will be remitted via permitted mode to

		as and when the same is received from the Designated Person and the same will be intimated accordingly.										
ii. Details of transfer/payment (In case of Online): In case of Demand Draft(DD):												
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD amount (in Rs.)</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)		
Particulars	Details											
Bank Name and branch												
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9	Any other relevant information	NA										

Thanking You,
Yours faithfully,

For and on behalf of Stampede Capital Limited



Mr. Srinivas Maya
Whole Time Director and Compliance Officer

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