



## BHARAT SEATS LIMITED

Plot No.1, Maruti Udyog Joint Venture Complex, Gurugram-122015 (Haryana) India  
Phones : +91-9643339870-74 Fax : 0124-2341188 E-mail:seats@bharatseats.net  
CIN: L34300DL1986PLC023540 WEBSITE: www.bharatseats.com

December 13, 2024

### Corporate Relationship Department

BSE Limited  
Floor 25, P.J. Towers  
Dalal Street  
Mumbai – 400 001

REF: SCRIP CODE: 523229

SCRIP ID: BHARATSE

**Subject: Intimation regarding violation of Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders under SEBI (Prohibition of Insider Trading) Regulations, 2015**

Dear Sir/Madam,

Pursuant to SEBI Master Circular No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2024/126 dated September 23, 2024, please find enclosed herewith disclosure for the violations related to the code of conduct under SEBI (PIT) Regulations, 2015 for your record.

We request you to kindly take the same on your record.

Yours faithfully,

**For Bharat Seats Limited**  
**Ritu Bakshi**

**Company Secretary and Compliance Officer**  
**Membership No.: F3401**



# BHARAT SEATS LIMITED

Plot No.1, Maruti Udyog Joint Venture Complex, Gurugram-122015 (Haryana) India  
 Phones : +91-9643339870-74 Fax : 0124-2341188 E-mail:seats@bharatseats.net  
 CIN: L34300DL1986PLC023540 WEBSITE: www.bharatseats.com

## REPORT BY BHARAT SEATS LIMITED FOR VIOLATIONS RELATED TO CODE OF CONDUCT UNDER SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

Pursuant to Schedule B read with Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 are as follows:

Sr. No.	Particulars	Details			
1.	Name of the listed company/ Intermediary/ Fiduciary	Bharat Seats 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	Ms. Binney Jethi			
	ii. PAN of the DP	BCBPJ5238F			
	iii. Designation of DP	Assistant Manager			
	iv. Functional Role of DP	Finance			
	v. Whether DP is Promoter or belongs to Promoter Group	No			
	<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	Equity Shares BSE: 523229			
	ii. No of shares traded and value (₹) (Date wise)	<b>Trade Type</b>	<b>Date</b>	<b>Quantity</b>	<b>Value</b>
		Buy	03/12/2024	6	1277.70
		Sale	09/12/2024	6	1330.80
	<b>D. In case value of trade(s) is more than ₹ 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			
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable			



## BHARAT SEATS LIMITED

Plot No.1, Maruti Udyog Joint Venture Complex, Gurugram-122015 (Haryana) India  
Phones : +91-9643339870-74 Fax : 0124-2341188 E-mail:seats@bharatseats.net  
CIN: L34300DL1986PLC023540 WEBSITE: www.bharatseats.com

4.	Details of violations observed under Code of Conduct	Trades executed during the Trading Window closure period without pre-clearance and contra trade.
5.	Action taken by Listed company	The matter has been intimated to the Chairman of the Audit Committee and Chairman of the Board. The Audit Committee shall take action as may deem fit in accordance with the requirements of Code of Conduct.
6.	Reasons recorded in writing for taking action stated above	In Compliance with the requirements under Regulation 9 of the (Prohibition of Insider Trading) Regulations, 2015
7.	Details of the previous instances of violations, if any, since last financial year	Nil
8.	Any other relevant information	-

Yours faithfully,

**For Bharat Seats Limited**  
**Ritu Bakshi**

**Company Secretary and Compliance Officer**  
**Membership No.: F3401**  
**e-mail: [ritu@bharatseats.net](mailto:ritu@bharatseats.net)**