



Usha Martin Limited

2A, Shakespeare Sarani, Kolkata (formerly Calcutta) - 700 071, India
Phone : (00 91 33) 39800300, Fax : (00 91 33) 2282 9029, 39800400/500
CIN : L31400WB1986PLC091621
Website : www.ushamartin.com

UML/SECT

5th December, 2020

The Secretary
National Stock Exchange of India Ltd
Exchange Plaza, 5th Floor,
Plot No.C/1, G Block,
Bandra Kurla Complex, Bandra (E)
Mumbai – 400 051
[Scrip Code: USHAMART]

The Secretary
The BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street
Mumbai – 400 001
[Scrip Code:517146]

Societe de la Bourse de
Luxembourg
35A Boulevard Joseph II
L-1840, Luxembourg
[Scrip Code: US9173002042]

Dear Sir / Madam,

Sub: Reporting regarding violation of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

With reference to SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020, please find enclosed report for violation related to code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in prescribed Annexure – A.

This is for your information and record.

Thanking you,

Yours faithfully,
For **Usha Martin Limited**


Shampa Ghosh Ray
Company Secretary

Encl. as above.

Annexure A

**Report by Usha Martin 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.	Particulars	Details
1.	Name of the listed company/ Intermediary/Fiduciary	Usha Martin Limited
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" 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	Mr. Sulabh Singh
	ii) PAN of the DP	GEJPS4400D
	iii) Designation of DP	Officer
	iv) Functional Role of DP	Accounts
	v) 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	NA
	ii) PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i) Name of the scrip	Usha Martin Limited – Equity Shares NSE Scrip Code : USHAMART BSE Scrip Code: 517146
	ii) No of shares traded and value (Rs.) (Date-wise)	815 equity shares purchased on 5 th October, 2020 at total cost of Rs.20,375/-
	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	Not Applicable



Sr. No.	Particulars	Details
	ii) Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4.	Details of violations observed under Code of Conduct	Purchase of equity shares of the Company during the period when the trading window was closed.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	Show Cause Notice was issued to Mr. Singh. On receiving his reply, a warning letter was issued to him forbidding him from entering into any such transaction in future in violation of statutory provisions.
6.	Reasons recorded in writing for taking action stated above	The Management has considered the matter and since it was the first instance of violation made by the said designated person and that there was no mala fide intent of making profit taking advantage of his position or information, a warning letter was issued to him forbidding him to enter into such a transaction in future in violation of statutory provisions.
7.	Details of the previous instances of violations, if any, since last financial year	No such previous instance.
8.	If any amount collected for Code of Conduct violation(s) :	No amount has been collected towards penalty for violation of the provisions since it was the first instance of violation.
	i) Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Not Applicable
	ii) Details of transfer/payment In case of Online:	Not Applicable



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9.	Any other relevant information	Nil																						

Date : 05.12.2020

Place : Kolkata



Yours faithfully,
For Usha Martin Limited


Shampa Ghosh Ray
Compliance Officer & Company Secretary
PAN : AGLPR9574R
Email ID : investor@ushamartin.co.in