

UML/SECT

2nd September, 2020

National Stock Exchange of India Ltd
Exchange Plaza,
Plot No C/1, G Block
Bandra Kurla Complex, Bandra (E)
Mumbai- 400051
Scrip Code: USHAMART

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai- 400001
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.	<i>Please tick appropriate checkbox</i> 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. C Y Kale
	ii) PAN of the DP	AMGPK4215K
	iii) Designation of DP	Sr. General Manager
	iv) Functional Role of DP	Maintenance
	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)	35 equity shares purchased on 21.07.2020, 22.07.2020 & 24.07.2020 at total cost of Rs.637.25
	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	Mr. Kale has submitted an apology to the Company stating that his portfolio manager inadvertently bought 35 equity shares of the Company during the stipulated trading window closure period without Mr. Kale's direct knowledge. Considering the small quantity of equity shares purchased and absence of any mala fide intent, his mistake may be condoned.
5.	Action taken by Listed company/ Intermediary/- Fiduciary	Show Cause Notice was issued to Mr. Kale. 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 based on the reasons cited above and the small number of equity shares traded by Mr. Kale, it is obvious that there is no mala fide intent of making profit taking advantage of his position or information. Even if his purchase was not made with his direct knowledge, 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) :	Since the transaction value involved is very small, no amount has been collected towards penalty for violation of the provisions.
	i) Mode of transfer to SEBI - IPEF (Online/Demand	Not Applicable



Sr. No.	Particulars	Details												
	Draft)													
	ii) Details of transfer/payment	Not Applicable												
	In case of Online:													
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td></td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (in Rs.)		
Particulars	Details													
Name of the transferor														
Bank Name, branch and Account number														
UTR/Transaction reference Number														
Transaction date														
Transaction Amount (in Rs.)														
	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														
DD Number														
DD Date														
DD Amount (in Rs.)														
9.	Any other relevant information	Nil												

Date : 02.09.2020

Place : Kolkata



Yours faithfully,
For Usha Martin Limited

Shampa Ghosh Ray
Compliance Officer & Company Secretary

PAN : AGLPR9574R

Email ID : investor@ushamartin.co.in