



**Date: 17<sup>th</sup> January, 2023**

To  
Corporate Relationship Department  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai - 400001

Respected Sir/Madam,

**Sub: Reporting of violations under SEBI (Prohibition of Insider Trading) Regulations, 2015**

This is in reference to the Company's Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find enclosed herewith the reports related to the violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by designated person, in the format prescribed by SEBI Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Yours Faithfully,  
for **Bambino Agro Industries Limited**

**Dinesh Vemula,**  
Company Secretary & Compliance Officer  
M. No.: FCS 11248

Encl: Annexures (1) and (2)

**WE BRING HEALTH, TASTE AND CONVENIENCE TO LIFE**

**Regd. Office:** 4E, Surya Towers, Sardar Patel Road, Secunderabad - 500 003, Telangana, India. Ph: +91-40-44363322  
E-mail: ho.hr@bambinoagro.com CIN: L15440TG1983PLC004363 www.bambinoagro.com

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 Company's 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.

Annexure (1)

Report by Bambino Agro Industries Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

For Intermediaries/ Fiduciaries: Schedule C read with Regulation 9(1) and 9(2) of SEBI(Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Bambino Agro Industries Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input checked="" type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr. Kartekeya Myadam
	ii. PAN of the DP	BKZPM3843H
	iii. Designation of DP	Nil
	iv. Functional Role of DP	Nil
	v. Whether DP is Promoter or belongs to Promoter Group	Promoter Group
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	Bambino Agro Industries Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	Acquired 15,85,827 Shares of the Company on 02.01.2023 by way of Gift (Through inter-se transfer)
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	

Sr. No.	Particulars	Details
	i. Date of intimation of trade(s) by concerned DP / director / promoter / promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	04.01.2023
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	06.01.2023
4	Details of violations observed under Code of Conduct	<ul style="list-style-type: none"> <li>• Breach of Code of Conduct</li> <li>• Trading during closure of window period</li> <li>• Not obtaining Pre clearance before indulging in any acquisition/sale</li> </ul>
5	Action taken by Listed company/ Intermediary/ Fiduciary	A Notice is issued to Mr. Kartekeya Myadam for strictly adhering to the Code of Conduct for prevention of Insider Trading and levied penalty
6	Reasons recorded in writing for taking action stated above	Violation of Code of Conduct, SEBI (PIT) Regulations, 2015 and other provisions of SEBI Regulations.
7	Details of the previous instances of violations, if any, since last financial year	Dealt in the scrips of the Company i.e 3200 eq.sh of the Company by violating the Code of Conduct under SEBI (PIT) Regulations, 2015 from 19th April 2021 to 11th May 2021 i.e., during the prohibited period of closure of trading window. A Notice is issued to Mr.Kartekeya Myadam for strictly adhering to the Code of Conduct for prevention of Insider Trading and directed him to remit the profit so disgorged on traded shares and levied penalty.
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	

ii. Details of transfer/paymentIn case of Online:		
<b>Particulars</b>	<b>Details</b>	
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):
<b>Particulars</b>	<b>Details</b>	
Bank Name and branch		
DD Number		
DD date		
DD amount (in Rs.)		
9	Any other relevant information	

Yours faithfully,

**Date : 17.01.2023**  
Place: Secunderabad

**Name : Dinesh Vemula**  
**Designation:** Company Secretary and Compliance  
Officer  
PAN: AIHPV5677M  
Email ID: cs@bambinoagro.com

## Annexure (2)

**Report by Bambino Agro Industries Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.**

*[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015*

*For Intermediaries/ Fiduciaries: Schedule C read with Regulation 9(1) and 9(2) of SEBI(Prohibition of Insider Trading) Regulations, 2015]*

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Bambino Agro Industries Limited
2	<p><i>Please tick appropriate checkbox</i></p> <p>Reporting in capacity of :</p> <p><input type="checkbox"/> Listed Company</p> <p><input checked="" type="checkbox"/> Intermediary</p> <p><input type="checkbox"/> Fiduciary</p>	
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mrs. Anita Myadam
	ii. PAN of the DP	ADDPM2034J
	iii. Designation of DP	Nil
	iv. Functional Role of DP	Nil
	v. Whether DP is Promoter or belongs to Promoter Group	Promoter
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	Bambino Agro Industries Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	Disposed 15,85,827 Shares of the Company on 02.01.2023 by way of Gift (Through inter-se transfer)
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	

Sr. No.	Particulars	Details
	i. Date of intimation of trade(s) by concerned DP / director / promoter / promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	04.01.2023
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	06.01.2023
4	Details of violations observed under Code of Conduct	<ul style="list-style-type: none"> <li>• Breach of Code of Conduct</li> <li>• Trading during closure of window period</li> <li>• Not obtaining Pre clearance before indulging in any acquisition/sale</li> </ul>
5	Action taken by Listed company/ Intermediary/ Fiduciary	A Notice is issued to Mrs. Anita Myadam for strictly adhering to the Code of Conduct for prevention of Insider Trading and levied penalty
6	Reasons recorded in writing for taking action stated above	Violation of Code of Conduct, SEBI (PIT) Regulations, 2015 and other provisions of SEBI Regulations.
7	Details of the previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	
	ii. Details of transfer/payment In case of Online:	
	<b>Particulars</b>	<b>Details</b>
	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):

	Particulars	Details	
	Bank Name and branch		
	DD Number		
	DD date		
	DD amount (in Rs.)		
9	Any other relevant information		

Yours faithfully,

**Date : 17.01.2023**  
Place: Secunderabad

**Name : Dinesh Vemula**  
**Designation:** Company Secretary and  
Compliance Officer  
PAN: AIHPV5677M  
**Email ID: cs@bambinoagro.com**