

Shilpa Medicare Limited

Corporate & Admin Office:

“Shilpa House”, # 12-6-214/A-1, Hyderabad Road,
Raichur – 584 135, Karnataka, India
Tel: +91-8532-238704, Fax: +91-8532-238876
Email: info@vbshilpa.com, Web: www.vbshilpa.com
CIN: L85110KA1987PLC008739

22nd October 2022

Corporate Relationship Department,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai-400 001

National Stock Exchange of India Limited
Exchange Plaza, 5th Floor,
Plot No.C/1, G Block
Bandra Kurla Complex, Bandra (E)
Mumbai-400 051

Dear Sir/Madam,

Stock Code: NSE: SHILPAMED/BSE-530549

Sub: Reporting of Violation of Code of Conduct for Prohibition of Insider Trading
Ref: SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020

We would like to inform that one of the Designated Person of Shilpa Medicare Limited (“Company”), have traded in the equity shares of the Company in violation of the Code read with SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”).

In compliance with the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, a report for the aforesaid is annexed as “Annexure-A”.

Kindly take the above information on record.

Thanking you,

For **Shilpa Medicare Limited**

RITU
TIWARY
Digitally signed
by RITU TIWARY
Date: 2022.10.22
15:02:39 +05'30'

Ritu Tiwary
Company Secretary & Compliance Officer
Encl.: a/a

Annexure A

Report by Shilpa Medicare 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	Shilpa Medicare 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	
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Suraj Kumar Innani
	ii. PAN of the DP	AAVPI8338N
	iii. Designation of DP	-
	iv. Functional Role of DP	-
	v. Whether DP is Promoter or belongs to Promoter Group	Promoter Group
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	NSE Symbol – SHILPAMED BSE Symbol - 530549
	ii. No of shares traded and value (Rs.) (Date- wise)	Purchased 3013 equity shares at Rs. 1024057.81 on 19-10-2022 during the window closure period and sold 3013 equity shares for Rs. 1011665.76 on 19-10-2022 i.e execution of contra trade amounting to a loss of Rs. 12392.05/-.

Sr. No.	Particulars	Details
	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	20 th October 2022
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	21 st October 2022
4	Details of violations observed under Code of Conduct	Inadvertently bought 3013 shares during the period of closure of Trading Window which amounts to Rs.10.24 Lakhs without taking pre-clearance for such trades from the Compliance Officer.
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>Audit Committee (AC) reviewed the violation and explanation given by Mr.Suraj Kumar Innani.</p> <p>Taking into consideration his explanation informing that it occurred due to inadvertence and miscommunication between the stock broker and him and immediately upon noticing the violation the respective shares were sold at a loss of Rs.12,392/-, the AC has unanimously decided to levy a penalty of Rs.25000/- (Rupees twenty five thousands only) for the said violation as a corrective measure and directed Mr. Suraj Kumar Innani to deposit the entire penalty amount of Rs.25000/- (Rupees twenty five thousands only) to the Company's bank account immediately within 7 days i.e on or before 29th October 2022.</p>

Sr. No.	Particulars	Details
		<p>The Audit Committee had advised the Company Secretary and Compliance Officer of the Company to issue a warning letter to Mr. Suraj Kumar Innani to strictly adhere to the provisions of the Code and also to remain diligent and be in complete compliance of the Code henceforth to avoid stringent actions for any subsequent violations.</p> <p>Accordingly, warning letter has been issued to him.</p>
6	Reasons recorded in writing for taking action stated above	<p>Mr. Suraj Kumar Innani had admitted that the trades executed by him in violation of the Code read with SEBI ("PIT Regulations") were unintentional and solely because of inadvertence and some miscommunication between the stock broker and him without any malafide intent.</p> <p>He also admitted that he was not in possession of any Unpublished Price Sensitive Information (UPSI).</p>
7	Details of the previous instances of violations, if any, since last financial year	First time identification of violation of the Code and the PIT Regulations.
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	

	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	None										

Yours faithfully,

For Shilpa Medicare Limited

RITU
TIWARY

Digitally signed
by RITU TIWARY
Date: 2022.10.22
15:24:44 +05'30'

Ritu Tiwary

Company Secretary & Compliance Officer

PAN: AGDPT2763Q

Email ID: cs@vbshilpa.com

Date: 22nd October 2022

Place: Raichur