

GMM/SEC/2021-22/41

May 19, 2021

To,

BSE Limited

Phiroze Jeejeebhoy Towers,
1st Floor, Dalal Street,
Mumbai – 400 001
Scrip Code: 505255

NSE Limited

Exchange Plaza, C-1, Block G,
Bandra Kurla Complex, Bandra (E)
Mumbai – 400 051
Symbol: GMMPFADLR

Subject: Intimation under Para 12 of Schedule B of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Dear Sir(s),

In accordance with Para 12 of Schedule B of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, (“PIT Regulations”) the Company would like to intimate as under:

1. Mr. Adapa Taraka Raja Sekharam identified as a ‘Designated Person’ under GMM Pfaudler’s Code of Conduct for Prevention of Insider Trading sold 50 equity shares of the Company in the fourth week of April 2021 which falls under the Trading Window Closure period which starts from March 31, 2021 up to 48 hours of the declaration of the unaudited financial results for the quarter and half year ended March 31, 2021. Accordingly, provisions of the PIT Regulations and the Code of Conduct of the Company have been contravened.
2. A show cause notice was issued by the Company on May 18, 2021 for violation of the Code of Conduct for Prevention of Insider Trading of GMM Pfaudler Limited.
3. The noticee vide reply dated May 18, 2021 informed the Company that the aforesaid sale of shares of the Company during the window closure period was inadvertent.
4. Taking into account all facts and submissions, the Company vide letter dated May 19, 2021 has levied a penalty of Rs. 10,000/- (Rupees Ten Thousand only) without prejudice to any other actions as may be initiated by the Securities & Exchange Board of India.

The noticee has made an online payment (IMPS) of Rs. 10,000/- (Rupees Ten Thousand Only) to SEBI-IEPF Account No. 012210210000008 maintained with Bank of India, Bandra Kurla Branch, Mumbai on May 19, 2021.

GMM Pfaudler Limited

Corporate Office: 902, Lodha Excelus, Commercial Tower 1, New Cuffe Parade, Sewri - Chembur Road, Mumbai-400022. • O: +91 22 6650 3900

Registered Office & Works: Vithal Udyognagar, Anand - Sojitra Road, Karamsad - 388 325 • O: +91 2692 661700 • F: +91 2692 661888 • CIN : L29199GJ1962PLC001171

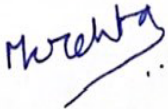
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Details as required in the format specified vide Circular No.: SEBI/HO/ISD/ISD/CIR/P/2020/135 July 23, 2020 is also enclosed.

We request you to kindly take the information on record.

Yours faithfully,

For **GMM Pfaudler Limited**



Mittal Mehta
Company Secretary & Compliance Officer

Encl: As above

**Report by GMM Pfaudler Limited for violations related to the 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	GMM Pfaudler Limited
2	Please tick appropriate checkbox Reporting in capacity of : <ul style="list-style-type: none"> • Listed Company • Intermediary • Fiduciary 	Listed Company
3.	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Adapa Taraka Raja Sekharam
	ii. PAN of the DP	AQDPA3670B
	iii. Designation of DP	General Manager – Glasslined Sales
	iv. Functional Role of DP	Sales
	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	Not applicable
	ii. PAN of the immediate relative of DP	Not applicable
	C. Details of transaction(s)	
	i. Name of the scrip	GMM Pfaudler Limited
	ii. No of shares traded and value (Rs.) (Date-wise)	Sale of 50 Equity Shares of face value Rs. 2/- each on April 20, 2021 Total value of Sales: Rs. 2,05,554.38
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter	

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	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
4.	Details of violations observed under Code of Conduct	Sale of Equity Shares during trading window closure period.
5.	Action taken by Listed Company/ Intermediary/ Fiduciary	Show cause notice was issued by the Company on May 18, 2021. Penalty of Rs. 10,000/- was levied and subsequently paid on May 19, 2021.
6.	Reasons recorded in writing for taking action stated above	Violation of clause No. 7(i)(a) of the Code of Conduct for Prevention of Insider Trading
7.	Details of the previous instances of violations, if any, since last financial year	Not applicable
8.	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online payment made to SEBI-IPEF
	ii. Details of transfer/payment	
	In case of Online:	
	Particulars	Details
	Name of the transferor	Adapa Taraka Raja Sekharam
	Bank Name, Branch and Account number	Bank Name: Axis Bank Limited Branch: Hydernagar branch, Hyderabad Account No. 068010100516310
	UTR/Transaction reference Number	AXMB211394337641
	Transaction date	May 19, 2021
	Transaction Amount (in Rs.)	Rs. 10,000/-
	In case of Demand Draft (DD):	
	Particulars	Details
	Bank Name and branch	Not applicable
	DD Number	-
	DD Date	-
	DD Amount (in Rs.)	-

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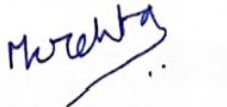
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9.	Any other relevant information.	-

Yours faithfully,

For **GMM Pfaudler Limited**



Mittal Mehta
Company Secretary & Compliance Officer

PAN: AFQPD2447B
Email id: mittal.mehta@gmmpfaudler.com
Mobile No.: 98339 05128

Date: May 19, 2021
Place: Mumbai