

orbit exports ltd.

122, MISTRY BHAWAN, 2ND FLOOR, NEAR K C COLLEGE, DINSHAW WACHHA ROAD, CHURCHGATE,
MUMBAI - 400 020. (MAH.) INDIA. TEL : 91 22 66256262 • FAX NO. 22822031 • WEBSITE : www.orbitexports.com
CIN : L40300MH1983PLC030872

Date: **February 10, 2022**

To,

The Manager,

Listing Department,

National Stock Exchange of India Ltd.,

Exchange Plaza,

Bandra Kurla Complex, Bandra (East),

Mumbai - 400051

Corporate Services Department

BSE Limited

Phiroze Jeejeebhoy Towers,

Dalal Street

Mumbai - 400001

Symbol: ORBTEXP

Security Code: 512626

Dear Sir/Madam

Subject: Reporting under SEBI (Prohibition of Insider Trading) Regulations, 2015

In terms of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company's Code of Conduct for Prevention of Insider Trading and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23rd July 2020, enclosing herewith report on Violation SEBI (Prohibition of Insider Trading) Regulations, 2015 and action taken by the Company in the prescribed form as Annexure -1.

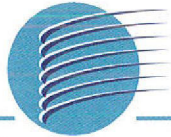
Kindly take the same on record.

Thanking You,

For Orbit Exports Limited




Pankaj Seth
Managing Director



orbit exports ltd.

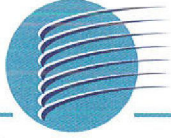
122, MISTRY BHAWAN, 2ND FLOOR, NEAR K C COLLEGE, DINSHAW WACHHA ROAD, CHURCHGATE,
MUMBAI - 400 020. (MAH.) INDIA. TEL : 91 22 66256262 • FAX NO. 22822031 • WEBSITE : www.orbitexports.com
CIN : L40300MH1983PLC030872

Annexure-1

**Report by Orbit Exports 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]

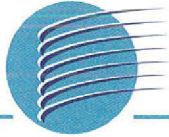
| Sr. No. | Particulars | Details |
|----------------------|---|---|
| 1. | Name of the listed company | Orbit Exports limited |
| 2. | Please tick appropriate checkbox Reporting in capacity of <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary | <input type="checkbox"/> Listed Company |
| 3. | A. Details of Designated Person (DP) | |
| | i. Name of the DP | Shri Varun Daga |
| | ii. PAN of the DP | AHNPD2386C |
| | iii. Designation of DP | Non-Executive Director |
| | iv. Functional Role of DP | Non-Executive Director -Member of Audit Committee |
| | v. Whether DP is Promoter or belongs to Promoter Group | No |
| | B. If Reporting is for immediate relative of | |
| | i. Name of the immediate relative of DP | Shri Kaushik Daga |
| | ii. PAN of the immediate relative of DP | AFAPD6586R |
| | C. Details of transaction(s) | |
| i. Name of the scrip | Orbit Exports Limited Scrip Code on BSE: 512626 NSE Symbol: ORBTEXP | |



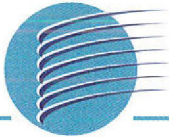
orbit exports ltd.

122, MISTRY BHAWAN, 2ND FLOOR, NEAR K C COLLEGE, DINSHAW WACHHA ROAD, CHURCHGATE,
MUMBAI - 400 020. (MAH.) INDIA. TEL : 91 22 66256262 • FAX NO. 22822031 • WEBSITE : www.orbitexports.com
CIN : L40300MH1983PLC030872

| ii. No of shares traded and value (Rs.) (Date-Wise) | | Sale By Shri Varun Daga | | | |
|--|--|-------------------------------|----------------|-----------------------|-------------------------|
| | | Date | Quant ity | Price per Share | Total |
| | | 03.01. 2022 | 38500 6787 | 70.24 70.22 | 2704240 476583.14 |
| | | 04.01. 2022 | 10095 30920 | 72.72 74 | 734108.4 2288080 |
| | | 05.01. 2022 | 47921 26692 | 80.61 81.05 | 3862911.81 2163386.6 |
| | | 06.01. 2022 | 2145 29949 | 84.29 86.32 | 180802.05 2585197.68 |
| | | 07.01. 2022 | 14150 | 83.03 | 1174874.5 |
| | | Total | 20715 9 | | 16170184.18 |
| | | Purchase by Shri Kaushik Daga | | | |
| | | Date | Quant ity | Price per Share | Total |
| | | 03.01. 2022 | 12719 30790 | 70.33 70.48 | 894527.3 2170079 |
| | | 04.01. 2022 | 31355 7571 | 74.69 72.81 | 2341905 551244.5 |
| | | 05.01. 2022 | 14178 61814 | 81.88 81.38 | 1160895 5030423 |
| | | 06.01. 2022 | 29180 9319 | 86.79 83.91 | 2532532 781957.3 |
| | | 07.01. 2022 | 658 5788 | 81.79 82.1 | 53817.82 475194.8 |
| | | Total | 20337 2 | | 15992576 |
| D. In case value of trade(s) is more than Rs.10 lakhs in a calendar | | | | | |
| i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015 | | January 11, 2022 | | | |



| | | |
|----|---|--|
| | ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015 | January 13, 2022 |
| 4. | Details of violations observed under Code of Conduct. | Shri Varun Daga sold the shares of the Company through trading platform of the Exchange which were purchased by his brother Shri Kaushik Daga. The said trades were executed during the Trading Window Closure Period by Designated Person and his relative. Hence such trade were in violation of Code of Conduct. |
| 5. | Action taken by Listed company/ Intermediary/ Fiduciary | The Company has received Disclosure under Regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015 from Shri Varun Daga. Immediately thereafter the Company has issued Show Cause Notice to Shri Varun Daga to which Shri Varun Daga in his Reply submitted that the execution of trade during Trading Window Closure Period was unintentional and inadvertant. The Audit Committee of the Company took the note of reply of Shri Varun Daga and after giving him opportunity of being heard, has imposed a Penalty of Rupees 50,000/- (Rupees Fifty Thousand Only) on Shri Varun Daga and both Shri Varun Daga and Shri Kaushik Daga were restricted from dealing in the Shares of the Company for three months from February 05, 2022. The Audit Committee Also warned them to adhere to the Company's Code of Conduct for Prevention of Insider Trading strictly in Letter and Spirit. |
| 6. | Reasons recorded in writing for taking action stated above. | Action taken against the DP as the trade done, even if unintentional, was in contravention of the Company's Code. |
| 7. | 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 | Online |
| 8. | In case of Online: | |
| | Name of the transferor | Orbit Exports Limited |



orbit exports ltd.

122, MISTRY BHAWAN, 2ND FLOOR, NEAR K C COLLEGE, DINSHAW WACHHA ROAD, CHURCHGATE,
MUMBAI - 400 020. (MAH.) INDIA. TEL : 91 22 66256262 • FAX NO. 22822031 • WEBSITE : www.orbitexports.com
CIN : L40300MH1983PLC030872

| | | |
|----|--------------------------------------|--------------------------------|
| | Bank Name, branch and Account number | HDFC BANK LTD & 50200006877613 |
| | UTR/Transaction reference Number | N041221828399302 |
| | Transaction date | 10-02-2022 |
| | Transaction Amount (In Rs.) | 50,000/- |
| 9. | Any other relevant information | Nil |

Yours Faithfully

For Orbit Exports Limited




Pankaj Seth
Managing Director

Date: February 10, 2022
Place: Mumbai