



September 28, 2020

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

Scrip Code: 500456

Sub: Report on violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

This has reference to SEBI circular no. SEBI/HO/ISD/CIR/P/2020/135 dated 23rd July, 2020 in relation to reporting to stock exchanges regarding violations related to Code of Conduct framed in accordance with SEBI (Prohibition of Insider Trading) Regulations, 2015.

It has been recently come to our notice that the following transactions were carried out by Mr. Satya Prakash Gupta, Whole-time Director of the Company without reporting to the Company:

1. As per BENPOS dated 10th July, 2020, 10,410 equity shares of the Company were debited from the demat account 1202290000300440 in the name of Satya Prakash Gupta (HUF) during the trading window closure period *i.e.* from 30th June, 2020 to 10th July, 2020;
2. As per BENPOS dated 11th September, 2020, 8,908 equity shares of the Company were credited in the above demat account standing in the name of Satya Prakash Gupta (HUF) during the period from 4th September, 2020 to 11th September, 2020

In order to sure about our observation, we have asked clarification from Mr. Satya Prakash Gupta, Whole time Director of the Company about such transaction. In this regard, Mr. Satya Prakash Gupta has confirmed that inadvertently, he had sold 1,502 shares on 9th July, 2020 *i.e.* during the trading window closure period and he had transferred 10,410 shares on 10th July, 2020 to his broker/trading member's account namely Master Capital Services Ltd against his margin obligations as required by his trading member. Subsequently, 8,908 shares were transferred back by trading member to his demat account on 9th September, 2020. He has confirmed that he had inadvertently carried out the aforesaid transactions without any malafide intention and he was not in possession of any unpublished price sensitive information of the Company at the time of the aforesaid transaction.

P A S U P A T I A C R Y L O N L T D .

□ CORPORATE OFFICE : M-14, CONNAUGHT CIRCUS, (MIDDLE CIRCLE), NEW DELHI-110 001 (INDIA) □ PHONE : EPABX- 47627400
□ Fax : 91-11-47627497, 47627498 □ E-MAIL : delhi@pasupatiacrylon.com □ VISIT OUR SITE : <http://www.pasupatiacrylon.com>
□ REGD. OFFICE & WORKS : KASHIPUR ROAD, THAKURDWARA-244 601 DISTT. MORADABAD (U.P.)
□ E-MAIL : works@pasupatiacrylon.com ★ pasupati_tkd@rediffmail.com
□ CIN : L50102UP1982PLC015532

In light of the above, please find enclosed a report on the abovementioned violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015, in the manner prescribed under the above mentioned SEBI Circular.

We request you to kindly take the above information on record.

Thanking you,

Yours faithfully,
For Pasupati Acrylon Limited



Bharat Kapoor
Company Secretary & Compliance Officer

Report by Pasupati Acrylon 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

| Sr. No. | Particulars | Details | |
|---------|--|---|--|
| 1 | Name of the listed company/ Intermediary/Fiduciary | Pasupati Acrylon Limited | |
| 2 | <p><i>Please tick appropriate checkbox</i></p> 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. Satya Prakash Gupta |
| | ii. | PAN of the DP | AADPG8631J |
| | iii. | Designation of DP | Director (Operations) – Whole-time Director |
| | iv. | Functional Role of DP | Operations |
| | 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 | Mr. Satya Prakash Gupta (HUF) |
| | ii. | PAN of the immediate relative of DP | AARHS2153M |
| | C. Details of transaction(s) | | |
| | i. | Name of the scrip | Pasupati Acrylon Limited |
| | ii. | No of shares traded and value (Rs.) (Date-wise) | Sale of 1,502 shares on 9 th July, 2020 at a price of Rs.12.48 each aggregating value of Rs. 18,745. He had transferred 10,410 shares on 10 th July, 2020 to his broker/ trading member's account namely Master Capital Services Ltd against his margin obligations as required by his trading member. Subsequently, 8,908 shares were transferred back by trading member to his demat account on 9 th September, 2020. |

| 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, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter |
| | ii. | Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015 | Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter |
| 4 | Details of violations observed under Code of Conduct | | As per BENPOS dated 10.07.2020, 10,410 shares were debited from the demat account No 1202290000300440 standing in the name of Satya Prakash Gupta (HUF) during the trading window closure period from 30th June, 2020 to 10th July, 2020. |
| 5 | Action taken by Listed company/ Intermediary/ Fiduciary | | Warning has been issued to Mr. Satya Prakash Gupta. He has been further advised that in case of any subsequent violation, stricter action(s) would be taken by the Company. |
| 6 | Reasons recorded in writing for taking action stated above | | Based on the response received from the Designated Person that it is the first violation and that trade was executed inadvertently and he did not have any malafide intention. He was not in possession of any unpublished price sensitive information of the Company at that time Further, the Designated Person has undertaken to be extra cautious while executing transactions in future and ensure compliance of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015. |
| 7 | Details of the previous instances of violations, if any, since last financial year | | None |
| 8 | If any amount collected for Code of Conduct violation(s) | | |
| | i. Mode of transfer to SEBI – IPEF (Online/Demand Draft) | | Not Applicable |
| | ii. Details of transfer/payment In case of Online: | | Not Applicable |



| | | | |
|---|--------------------------------|----------------|--|
| | 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: 28th September, 2020

Place: New Delhi

Name and Signature of Compliance Officer

Bharat Kapoor

PAN:AQXP9114E

Email ID:csbharat.pal@gmail.com