



**16<sup>th</sup> December, 2023**

**Listing / Compliance Department**

**BSE Limited**

Floor 25, P J Towers,  
Dalal Street,  
Mumbai – 400 001

**Scrip Code: 540738**

**Subject : Reporting to Stock Exchanges of violation under SEBI (Prohibition of Insider Trading) Regulations, 2015, relating to the Code of Conduct (CoC)**

**Reference: Circular bearing Reference No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.**

Dear Sir / Madam,

We enclose herewith the report for violation related to Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations") by a Designated Person, as observed by the Compliance Officer of the Company.

The matter was discussed in the Audit Committee Meeting held on 16<sup>th</sup> December, 2023 and the outcome of the same is enclosed herewith for your information & records.

Thanking you,  
Yours faithfully,  
**For Shreeji Translogistics Limited**

**Rajnikant C. Shah**  
**Wholetime Director**  
**(DIN: 00269109)**  
**Encl. : As Above**



**Report by Shreeji Translogistics Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

Sr. No.	Particulars	Details
1	Name of the listed company/ <del>Intermediary/Fiduciary</del>	M/s. Shreeji Translogistics Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input checked="" type="checkbox"/> Intermediary <input checked="" type="checkbox"/> Fiduciary	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr. Satish R. Shah
	ii. PAN of the DP	AAIPS8934M
	iii. Designation of DP	Independent Director
	iv. Functional Role of DP	Independent Director
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	Mrs. Asmita S. Shah
	ii. PAN of the immediate relative of DP	AAKPS3757L
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	Shreeji Translogistics Limited (BSE Scrip code: 540738)
	ii. No of shares traded and value (Rs.) (Date- wise)	<b>During Trading Window Closure period:</b> 1. Sold 605 Shares of the Company for an aggregate value of Rs. 39,325/- on 04/10/2023 2. Sold 395 Shares of the Company for an aggregate value of Rs. 25,379/- on 05/10/2023
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter</b>	
	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

	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	Mrs. Asmita S. Shah, wife of Mr. Satish R. Shah, Independent Director, sold 1000 shares of the Company during the closure of trading window.
5	Action taken by Listed company/ Intermediary/ Fiduciary	The matter was discussed in the Audit Committee Meeting held on 16 <sup>th</sup> December, 2023. The Audit Committee recommended that considering this is the first mistake of violation and the quantum and value of the equity shares sold not being of a significant value, the Committee feels imposition of any penalty will not be proportionate to the offence and conduct of the person. Hence, in view of the current circumstances, the Committee provided relaxation from imposing any penalty upon her and served a warning upon her not to commit any violation under the SEBI PIT Regulations in future.
6	Reasons recorded in writing for taking action stated above	Mrs. Asmita S. Shah has clarified that, the trades executed by her were out of inadvertence and were not undertaken to violate the Code of Conduct or to earn any profits/ gains.  She has given an undertaking assuring that she will duly ensure that regulations are not violated and such error is not repeated in future.
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)	N.A

iii. Details of transfer/payment	
In case of Online:	
<b>Particulars</b>	<b>Details</b>
Name of the transferor	N.A
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	N.A
DD Number	
DD date	
DD amount (in Rs.)	
9	Any other relevant information
	None

Yours Faithfully

**For Shreeji Translogistics Limited**

**Rajnikant C. Shah**

**Wholetime Director**

**(DIN: 00269109)**

PAN: AAGPS0703G

Email: rcs@shreejittransport.com

Date: 16<sup>th</sup> December, 2023

Place: Navi Mumbai