

Date: 25<sup>th</sup> November, 2022

To,  
Corporate Relations Department  
**BSE Limited**  
2<sup>nd</sup> floor, P.J. Tower,  
Dalal Street,  
Mumbai – 400 001  
**Company Code: 532888**

To  
Corporate Relations Department  
**National Stock Exchange of India Limited**  
Exchange Plaza, Plot No. C/1, G-Block  
Bandra Kurla Complex, Bandra (E),  
Mumbai- 400 051  
**Company Code: ASIANTILES**

Dear Sir/ Madam,

**Subject: Report on violation of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in continuation to our Report submitted on 10<sup>th</sup> October, 2022 to the Exchanges.**

**Reference: SEBI Gazette Notification No. SEBI/LAD-NRO/GN/2020/23 dated July 17, 2020 read with SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020.**

With reference to the captioned subject and in continuation with our earlier report submitted on 10<sup>th</sup> October, 2022, please find enclosed a report on violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 after mentioning details of deposit of fine with IPEF in field no. 8 of this report.

You are requested to kindly take on your record.

Thanking You.

Yours truly,

**For Asian Granito India Limited**

**Dhruvi Trivedi**  
**Company Secretary and Compliance Officer**

Encl: as above

## Annexure A

### Report by Asian Granito India Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed company: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

For Intermediary/ Fiduciary: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details																														
1.	Name of the listed company/ <del>Intermediary/Fiduciary</del>	Asian Granito India Limited																														
2.	Please tick appropriate checkbox Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company																														
3.	<b>A. Name of the Designated Person (DP)</b>																															
	i. Name of the DP	Mr. Kandarp Gajendra Trivedi																														
	ii. PAN of the DP	AATPT3158R																														
	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	Not Applicable																														
	ii. PAN of the immediate relative of DP																															
	<b>C. Details of transaction(s)</b>																															
	i. Name of the scrip	BSE: 532888 NSE: ASIANTILES																														
	ii. No of shares traded and value (Rs.) (Date- wise)	Buy – 18.05.2022 (100 shares)																														
		Sell – 19.05.2022 (100 shares)																														
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No. of shares</th> <th>Price</th> <th>Amount (Rs.)</th> <th>No. of shares</th> <th>Price</th> <th>Amount (Rs.)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">58</td> <td style="text-align: center;">65.65</td> <td style="text-align: center;">3807.70</td> <td style="text-align: center;">58</td> <td style="text-align: center;">61.90</td> <td style="text-align: center;">3590.20</td> </tr> <tr> <td style="text-align: center;">27</td> <td style="text-align: center;">65.65</td> <td style="text-align: center;">1772.55</td> <td style="text-align: center;">27</td> <td style="text-align: center;">61.90</td> <td style="text-align: center;">1671.30</td> </tr> <tr> <td style="text-align: center;">15</td> <td style="text-align: center;">65.65</td> <td style="text-align: center;">984.75</td> <td style="text-align: center;">15</td> <td style="text-align: center;">61.85</td> <td style="text-align: center;">927.75</td> </tr> <tr> <td colspan="2" style="text-align: center;">Total</td> <td style="text-align: center;">6565</td> <td colspan="2" style="text-align: center;">Total</td> <td style="text-align: center;">6189.25</td> </tr> </tbody> </table>	No. of shares	Price	Amount (Rs.)	No. of shares	Price	Amount (Rs.)	58	65.65	3807.70	58	61.90	3590.20	27	65.65	1772.55	27	61.90	1671.30	15	65.65	984.75	15	61.85	927.75	Total		6565	Total		6189.25
No. of shares		Price	Amount (Rs.)	No. of shares	Price	Amount (Rs.)																										
58		65.65	3807.70	58	61.90	3590.20																										
27		65.65	1772.55	27	61.90	1671.30																										
15	65.65	984.75	15	61.85	927.75																											
Total		6565	Total		6189.25																											
	There is Loss of Rs. 375.75/-																															
	<b>D. In case value of trade(s) is more than Rs 10 lacs in a calendar quarter -</b>																															
	i. Date of intimation under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Not Applicable																														
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015																															

4.	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015	Contra trade of shares without taking pre-clearance while trading window is closed.		
5.	Action taken by Listed company/ Intermediary/Fiduciary	Audit Committee has imposed penalty on Mr. Kandarp Gajendra Trivedi of Rs.1,00,000/- and the same was considered by Board.		
6.	Reasons recorded in writing for taking action stated above	The designated person explained that he had mistakenly passed on wrong trading instruction to broker, which he noticed and confirmed to the Company, once Company inquired after the mail from BSE. He informed compliance officer of the mistake and informed that the matter has gone beyond his control. He is ready to face penal action which will be decided by the audit committee. He also mentioned that there is no precedence of him carrying out such transaction and this is his first inadvertent error of judgement.		
7.	Details of the previous instances of violations, if any, since last financial year	NIL		
8.	If any amount collected for Code of Conduct violation(s)	Rs.1,00,000/-		
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online		
	ii. Details of transfer/payment In case of Online:  If any amount collected for Code of Conduct violation(s)	<b>Particulars</b>	<b>Details</b>	
		Name of the transferor	TRIVEDI KANDARP	
		Bank Name, branch and Account number	ICICI Bank, Bodakdev Branch, Ahmedabad. Account No. 230801506433	
		UTR/Transaction reference Number	0543006536	
		Transaction date	24/11/2022	
Transaction	Rs. 1,00,000/-			
9.	Any other relevant information			

Yours faithfully,  
**For Asian Granito India Limited**

**Dhruvi Trivedi**  
**Company Secretary and Compliance Officer**  
PAN: AFAPT1698G  
Email id: [cs@aglasiangranito.com](mailto:cs@aglasiangranito.com)

Date : 25/11/2022  
Place : Ahmedabad