



DILIP BUILDCON LIMITED
INFRASTRUCTURE & BEYOND

January 12, 2021

To

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai- 400001

National Stock Exchange of India Ltd.
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (E)
Mumbai - 400 051

Scrip Code - 540047

Scrip Code - DBL

Sub: Reporting for violation of SEBI (Prohibition of Insider Trading Regulations, 2015) relating to Code of Conduct by the Designated Person.

Dear Sir,

With reference to SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, we hereby submit a report with respect to the violation of Code of the Company framed under SEBI (Prohibition of Insider Trading) Regulations, 2015.

The concerned Designated Person has remitted the fine to the Company's account and the Company in turn has transferred the said amount to the Investor Protection and Education Fund (IPEF) administered by SEBI under the SEBI Act, 1992. The details of such remittance have been provided in the report enclosed herewith.

We request you to kindly take this information on your record.

For Dilip Buildcon Limited


Abhishek Shrivastava
Company Secretary



ISO 9001:2015

CIN No. L45201MP2006PLC018689

Regd. Office :

Plot No. 5, Inside Govind Narayan Singh Gate,
Chuna Bhatti, Kolar Road, Bhopal - 462 016 (M.P.)

Ph. : 0755-4029999, Fax : 0755-4029998

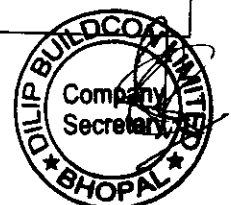
E-mail : db@dilipbuildcon.co.in, Website : www.dilipbuildcon.com

Report by Dilip Buildcon 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

S.No.	Particulars	Details
1.	Name of the Listed Company	Dilip Buildcon Limited
2.	<i>Please tick appropriate checkbox</i> Reporting in capacity of : Listed Company Intermediary Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i) Name of the DP	Mr. Rajkumar Aharwal
	ii) PAN of the DP	AKLPA7489E
	iii) Designation of DP	Assistant General Manager (Power Transmission)
	iv) Functional Role of DP	Bidding for Transmission Projects
	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	Equity Shares of Dilip Buildcon Limited
	ii) No of shares traded and value (Rs.) (Date- wise)	Share Purchased - 1 Share Value (Rs.) - 348.95 Date of Transaction - November 9, 2020 Share Sold - 1 Share Value (Rs.) - 375.10 Date of Transaction - November 19, 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
	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	Contra Trade transaction



5.	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The DP has been penalised by asking him to remit Rs. 230.00 as penalty including the amount of profit of Rs. 26.15 earned by him on the said transaction.</p> <p>DP has remitted an amount of Rs. 230.00, which is transferred by the Company to the Investor Protection and Education Fund (IPEF) administered by SEBI.</p>
6.	Reasons recorded in writing for taking action stated above	<p>Background:</p> <p>1. The Company has observed that Mr. Rajkumar Aharwal (Designated Person), entered into a Contra Trade transaction of 1(one) Equity share and thereby violated the Code of Conduct of the Company.</p> <p>He acquainted the Company that the trade was done erroneously and inadvertently and was not undertaken to violate the Code of Conduct formed under SEBI (PIT) Regulations and without any <i>mala fide</i> intention. Also, he lacks trading history for last 10 years and have insufficient knowledge of dealing in securities and also informed the Company that due to continuous travelling he was unaware about the advice letter issued by the Company for not entering into Contra trade transaction. Further he tendered his sincere regret and apologies in this regard and assured that he will not enter into any such transaction that violates the Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations.</p> <p>Since the DP has provided his sincere apologies and has done the said transaction inadvertently due to lack of knowledge. Therefore, the same was noted and the company has penalized him along with strict warning for not violating the Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations in future.</p> <p>Reasons for Action</p> <p>Therefore, keeping in view that this was done inadvertently and erroneously, without any <i>mala fide</i> intention of violating Code of Conduct of the Company and since this is his first instance and no trading history for last 10 (Ten) years was done by him, the Audit Committee has decided that the DP should be penalized for an amount of Rs. 230.00 including the amount of profit earned i.e. Rs. 26.15 and refrained him from executing any transactions in the shares of the Company for a period of 1 year.</p>
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)	Online
	ii) Details of transfer/payment In case of Online: In case of Demand Draft (DD):	230/-



In case of Online	
Particulars	Details
Name of the Transferrer	Dilip Buildcon Limited
Bank Name Branch and Account No.	Punjab National Bank Shahpura Branch 3229008700000687
UTR/ Transaction Reference	PUNBH21011652189
Transaction Date	11.01.2021
Transaction Amount	230.00
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	

