



# Gyscoal® Alloys Ltd.

An ISO 9001 Certified Company  
Government Recognized One Star Export House

**Corporate Office:**

2nd Floor, Mrudul Tower,  
B/h. Times of India, Ashram Road,  
Ahmedabad - 380 009, Gujarat, INDIA.  
Tel.: +91-79-66614508 E-mail: info@gyscoal.com  
Web.: www.gyscoal.com  
**CIN: L27209GJ1999PLC036656**

**Regd. Office & Factory:**

Ubkhali, Kukarwada - 382 830,  
Tal.: Vijapur, Dist.: Mehsana,  
Gujarat, INDIA.  
Tel.: +91-2763-252384  
Fax: +91-2763-252540  
E-mail: info@gyscoal.com

28<sup>th</sup> February, 2019

To,  
Department of Corporate Services  
**Bombay Stock Exchange Limited**  
Phiroze Jeejeebhoy Tower,  
Dalal Street, Mumbai – 400 001.

Department Of Corporate Services  
**National Stock Exchange of India Ltd.,**  
Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex,  
Bandra (E)  
Mumbai – 400 051

SCRIP CODE:  
**533275**

COMPANY SYMBOL: GAL

SUB.: Disclosure

Dear Sir/Madam,

Please find enclosed the disclosure titled "Inadvertent Trading during Trading Window Closure".

This is for your Information and records.

Thanking you.

Yours faithfully,

For, Gyscoal Alloys Limited

*Bhavika*  
**Bhavika Sharma**  
Company Secretary &  
Compliance Officer





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## Inadvertent Trading during Trading Window Closure

Gyscoal Alloys Limited ("Gyscoal" or the "the Company") today notified the stock exchanges of the occurrence of an inadvertent trade by Sampati Securities Limited ("a body corporate of Promoter Group") of Gyscoal Alloys Limited during trading window closure.

On February 14, 2019, it was brought to the attention of the Compliance Officer of Gyscoal Alloys Limited that Sampati Securities Limited (a body corporate of Promoter Group) in which Mr. Viral M Shah and Mr. Zankarsinh Solanki are the Directors and are also Directors of Gyscoal Alloys Limited, had inadvertently, through Sampati Securities Limited's Portfolio Management Services account, bought 300000 shares of Gyscoal Alloys limited. The trade occurred when the trading window was closed.

The Purchase of the shares was carried out by a fund manager for all his clients. In portfolio management services, the investor does not generally monitor the day-to-day investment decisions. In this case as well, Mr. Viral M Shah and Mr. Zankarsinh Solanki had made no instruction to carry out the trade and they were unaware of the trade having occurred.

The Audit Committee of the Company's Board of Directors, which is responsible for review of compliance with the Insider Trading Policy of the Company, was notified of this matter. Based on Sampati Securities Limited's submission, the Audit Committee believes, that this was an inadvertent trade made without intent to violate the Gyscoal's Insider Trading Policy or the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations"). However, the Audit Committee has determined that there was violation of the Gyscoal's Insider Trading Policy and the PIT Regulations and therefore imposed on Sampati Securities Limited, a penalty of Rs. 46,800 to be made to a Prime Minister's National Relief Fund. In accordance with the PIT Regulations and the Gyscoal's Insider Trading Policy, Gyscoal will also be notifying the SEBI of this event.

