

Ref: SEL/2020-21/37

October 03, 2020

To,
The Dy. Gen Manager
Corporate Relationship Dept.
BSE Limited
P.J. Tower, Dalal Street,
Mumbai- 400 001

To,
National Stock Exchange of India Ltd.
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex, Bandra (E),
Mumbai - 400 051
Fax : 022-26598237-38

Equity Scrip Code: 532710

Equity Scrip Name: SADBHAV

Dear Sir/Madam,

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

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

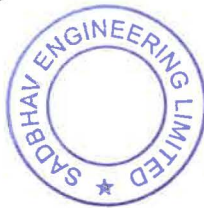
With respect to the above subject and reference, please find enclosed herewith the report by the Company for violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the prescribed form **Annexure -A**.

Kindly take the above information on record.

Thanking You,

Yours Faithfully,

For Sadbhav Engineering Ltd.



Tushar Shah
Company Secretary
Mem. No. F7216

Encl: As Above

Annexure - A

Report by Sadbhav Engineering 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

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Sadbhav Engineering Limited
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Patel Vipul Harishchandra
	ii. PAN of the DP	AEQPP9920C
	iii. Designation of DP	Promoter Group
	iv. Functional Role of DP	Resigned as Executive Director w.e.f. 24-04-2020
	v. Whether DP is Promoter or belongs to Promoter Group	Yes
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	C. Details of transaction(s)	
	i. Name of the scrip	Sadbhav Engineering Limited-Equity
	ii. No of shares traded and value (Rs.) (Date-wise)	153631 equity shares sold aggregating to Rs.77,19,787.22 on 01-10-2020
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	

T. Kumar


Sr.	Particulars	Details
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	03-10-2020
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI(PIT) Regulations, 2015	03-10-2020
4	Details of violations observed under Code of Conduct	<p>1. No pre-clearance of trade was obtained from compliance officer for sale of 153631 equity shares as the value of sale exceeding Rs. 10 Lakhs in a calendar quarter</p> <p>2. Shares sold during trading window closure period.</p>
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>Warning letter has been issued to the Designated Person that he would not engage in any kind of dealings in the Equity Shares of the Company in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and a monetary penalty of Rs. 25,000/- (Rupees Twenty Five Thousand Only) on the said transaction has been imposed. The aforesaid penalty will be submitted to the Investor Protection and Education Fund of SEBI.</p> <p>The designated person has also been provided again with a copy of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015. He has been further advised that in case of any subsequent violation stricter action(s) would be taken by the Company.</p>
6	Reasons recorded in writing for taking action stated above	Based on our findings and the response received from the Designated Person, it was noted that this incidence was the first instance of violation on the part of the Designated Person wherein he has not obtained pre clearance from Compliance officer and he has sold 153631 Equity Shares on October 01, 2020 amounting to total value of Rs. 77,19,787.22 during trading window closure period.

		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 for himself, immediate relatives and dependents.												
7	Details of the previous instances of violations, if any, since last financial year	NA												
8	If any amount collected for Code of Conduct violation(s)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Being Remitted												
	ii. Details of transfer/payment In case of Online:													
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td></td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table>		Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (in Rs.)	
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9	Any other relevant information	Mr. Vipul Patel has submitted request for Reclassification from Promoter to Public Category vide letter dated 28.08.2020 and Board has approved the request dated 02.09.2020.												

Yours faithfully,

Date : October 03, 2020

Place: Ahmedabad



Name: Tushar D. Shah

Company Secretary and Compliance Officer

PAN: ANYPS3293A

Email ID: tushar.shah@sadbhav.co.in

