

October 5, 2020

आश्विन (अधिक) - कृष्णपक्ष – तृतीया
विक्रम सम्वत् २०७७

National Stock Exchange of India Limited
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (E), Mumbai – 400 051
NSE Code: GHCL

BSE Limited
Corporate Relationship Department,
1st Floor, New Trading Ring, Rotunda Building,
P.J. Towers,
Dalal Street, Fort, Mumbai – 400 001
BSE Code: 500171

Dear Sir/Madam,

Subject: Standardizing Reporting of violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

This is to inform you that in terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“the SEBI Regulations”), Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons (“Code of Company”) and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of the Code of Conduct of the Company by the Designated Person along with the action taken by the Company thereon is enclosed as “**Annexure A**” to this letter.

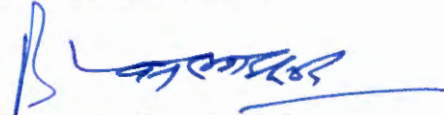
We would like to submit that the reported deviation is not material in relation to the total paid up equity share capital of the Company.

We request you to take the same on record.

Thanking you

Yours faithfully

For GHCL Limited



Bhuwneswar Mishra
Sr. General Manager & Company Secretary

Annexure –A

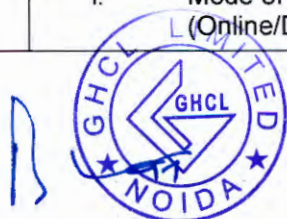
Report by GHCL Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

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

S. No.	Particulars	Details
1	Name of the listed company / Intermediary/Fiduciary	GHCL Limited
2	Please tick appropriate option Reporting in capacity of: <input checked="" 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 of DP	Mr. Deepak Singhal
	ii. PAN of DP	BAHPS9171C
	iii. Designation of DP	Assistant General Manager (Finance & Accounts)
	iv. Functional Role of DP	Indirect Taxation Department
	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	GHCL Limited
	ii. No of shares and value (Rs.) (Date-wise)	Reverse buy of 500 equity shares on August 31, 2020 at Rs. 159.86 per share
	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 (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	Not Applicable
4	Details of violations observed under Code of Conduct	The DP purchased 500 equity shares of the Company on August 31, 2020 @ Rs. 159.86 under DPID/Client ID:



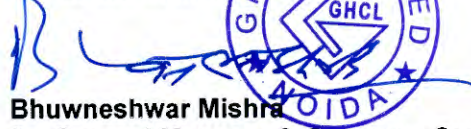
		<p>IN30302853238529. This transaction is a violation to the Code of conduct of the company due to "reverse buy".</p> <p>The DP had sold 1000 equity shares on August 14, 2020 @ Rs. 150.13 per share.</p>
5	Action taken by Listed company/Intermediary/Fiduciary	<p>A warning notice issued to the DP highlighting violation of the Code of conduct of the company due to reverse buy for the very first time. DP sold shares @Rs. 150.13 per share and purchased shares @ Rs. 159.86 within 6 months from the date of sale (i.e. first transaction). We observed that the DP did not make any personal gain / profit in this transaction. Hence, after taking into consideration of all the facts and circumstances, it was concluded that this is not a fit case for imposing any monetary penalty.</p> <p>Further, Company has taken following disciplinary actions;</p> <p>(i) Mr. Deepak Singhal shall not enter into an opposite transaction during the next twelve months from the date of the aforesaid transaction. Hence, Mr. Singhal is directed not to sell said 500 equity shares of the company till 31-08-2021.</p> <p>(ii) Mr. Singhal is also advised to take extra precaution in future while dealing in the Company's share.</p>
6	Reasons recorded in writing for taking action stated above	<p>The aforesaid action was taken after taking into account the following factors:</p> <ol style="list-style-type: none"> 1. It being first instance of non-compliance (procedural) on the part of the DP. 2. DP did not make any personal gain / profit in this transaction.
7	Details of the previous instances of violations, if any, since last financial year	Not Applicable
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF L (Online/Demand Draft)	Not Applicable



	<p>In case of Online:</p> <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> <p>In case of Demand draft (DD):</p> <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD 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.)		Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)		
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9	Any other relevant information	None																						

Yours faithfully,

For GHCL Limited



Bhuneshwar Mishra
Sr. General Manager & Company Secretary
PAN:AIWPM9409M
Email ID: bmishra@ghcl.co.in



Date: 05-10-2020
Place: Noida