

February 4, 2021

माघ – कृष्णपक्ष- सप्तमी

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



Bhuneshwar Mishra
Sr. GM-Sustainability & 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

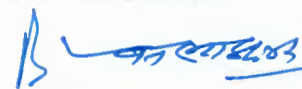
S. No.	Particulars	Details
1	Name of the listed company Intermediary/Fiduciary	GHCL Limited
2	Please tick appropriate option Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the of DP	Mr. Amit Ahiniya
	ii. PAN of DP	AJDPA1400C
	iii. Designation of DP	Sr. Manager (IT)
	iv. Functional Role of DP	Employee of the Company
	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)	The designated person has sold 40 shares on January 5, 2021 @ Rs. 210.68/- per share, aggregating to Rs. 8427.20/- (Rupees Eight Thousand Four Hundred Twenty Seven and Twenty Paise)
	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 sold 40 equity shares of the Company on January 5, 2021 @ Rs. 210.68 under DPID/Client ID: IN30154932615597 during the trading window closure.



5	Action taken by Listed company/Intermediary/ Fiduciary	(i) Mr. Amit Ahiniya was directed to pay penalty of Rs. 1000/- and deposited the same into SEBI – IEPF Account. (ii) Mr. Ahiniya was also warned to take extra precaution in future while dealing in the Company's share.																								
6	Reasons recorded in writing for taking action stated above	The aforesaid action was taken after taking into account the following factors: 1. It being first instance of non-compliance (procedural) on the part of the DP. 2. Mr. Amit Ahiniya was not made violation of contra trade.																								
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 (Online/Demand Draft)	Online																								
	ii. Details of transfer/payment																									
	In case of Online: <table border="1"> <thead> <tr> <th>Particulars</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> </tr> <tr> <td>Bank Name, branch and Account Number</td> </tr> <tr> <td>User Reference No.:</td> </tr> <tr> <td>RRN Reference No.</td> </tr> <tr> <td>Transaction date</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> </tr> </tbody> </table> In case of Demand draft (DD): <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	Name of the transferor	Bank Name, branch and Account Number	User Reference No.:	RRN Reference No.	Transaction date	Transaction Amount (in Rs.)	Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)		<table border="1"> <thead> <tr> <th>Details of online Payments made by DP</th> </tr> </thead> <tbody> <tr> <td>Mr. Amit Ahiniya</td> </tr> <tr> <td>HDFC Bank Limited, Amritdeep Raj Mahal Road, Veraval-362265 Account No.: 02301050033217</td> </tr> <tr> <td>103512195095</td> </tr> <tr> <td>103512183871</td> </tr> <tr> <td>February 4, 2021</td> </tr> <tr> <td>Rs. 1000/-</td> </tr> </tbody> </table> NA	Details of online Payments made by DP	Mr. Amit Ahiniya	HDFC Bank Limited, Amritdeep Raj Mahal Road, Veraval-362265 Account No.: 02301050033217	103512195095	103512183871	February 4, 2021	Rs. 1000/-
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9	Any other relevant information	None																								

Yours faithfully,

For GHCL Limited



Bhuneshwar Mishra
Sr. GM-Sustainability & Company Secretary
PAN: AIWPM9409M
Email ID: bmishra@ghcl.co.in



Date: 04-02-2021

Place: Noida