

## **Shilpa Medicare Limited**

### **Corporate & Admin Office:**

“Shilpa House”, # 12-6-214/A-1, Hyderabad Road,  
Raichur – 584 135, Karnataka, India  
Tel: +91-8532-238704, Fax: +91-8532-238876  
Email: info@vbshilpa.com, Web: www.vbshilpa.com  
CIN: L85110KA1987PLC008739

22<sup>nd</sup> October 2022

Corporate Relationship Department,  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
**Mumbai-400 001**

National Stock Exchange of India Limited  
Exchange Plaza, 5<sup>th</sup> Floor,  
Plot No.C/1, G Block  
Bandra Kurla Complex, Bandra (E)  
**Mumbai-400 051**

Dear Sir/Madam,

**Stock Code: NSE: SHILPAMED/BSE-530549**

**Sub: Reporting of Violation of Code of Conduct for Prohibition of Insider Trading**  
**Ref: SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020**

We would like to inform that one of the Designated Person of Shilpa Medicare Limited (“Company”), have traded in the equity shares of the Company in violation of the Code read with SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”).

In compliance with the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, a report for the aforesaid is annexed as “Annexure-A”.

Kindly take the above information on record.

Thanking you,

For **Shilpa Medicare Limited**

**RITU**  
**TIWARY**  
Digitally signed  
by RITU TIWARY  
Date: 2022.10.22  
15:02:39 +05'30'

**Ritu Tiwary**  
**Company Secretary & Compliance Officer**  
Encl.: a/a

## Annexure A

### Report by Shilpa Medicare 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  | Shilpa Medicare Limited   |
| 2       | <i>Please tick appropriate checkbox</i><br>Reporting in capacity of:<br><input checked="" type="checkbox"/> Listed Company<br><input type="checkbox"/> Intermediary<br><input type="checkbox"/> Fiduciary |   |
| 3       | <b>A. Details of Designated Person (DP)</b>   |   |
|         | i. Name of the DP   | Mr. Suraj Kumar Innani  |
|         | ii. PAN of the DP   | AAVPI8338N  |
|         | iii. Designation of DP  | -   |
|         | iv. Functional Role of DP   | -   |
|         | v. Whether DP is Promoter or belongs to Promoter Group  | Promoter Group  |
|         | <b>B. If Reporting is for immediate relative of DP</b>  |   |
|         | i. Name of the immediate relative of DP   | Not Applicable  |
|         | ii. PAN of the immediate relative of DP   | Not Applicable  |
|         | <b>C. Details of transaction(s)</b>   |   |
|         | i. Name of the scrip  | NSE Symbol – SHILPAMED<br>BSE Symbol - 530549   |
|         | ii. No of shares traded and value (Rs.) (Date- wise)  | Purchased 3013 equity shares at Rs. 1024057.81 on 19-10-2022 during the window closure period and sold 3013 equity shares for Rs. 1011665.76 on 19-10-2022 i.e execution of contra trade amounting to a loss of Rs. 12392.05/-. |

| Sr. No. | Particulars  | Details  |
|---------|--|--|
|         | <b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>  |  |
|         | i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015 | 20 <sup>th</sup> October 2022  |
|         | ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015                              | 21 <sup>st</sup> October 2022  |
| 4       | Details of violations observed under Code of Conduct   | Inadvertently bought 3013 shares during the period of closure of Trading Window which amounts to Rs.10.24 Lakhs without taking pre-clearance for such trades from the Compliance Officer.  |
| 5       | Action taken by Listed company/ Intermediary/ Fiduciary  | <p>Audit Committee (AC) reviewed the violation and explanation given by Mr.Suraj Kumar Innani.</p> <p>Taking into consideration his explanation informing that it occurred due to inadvertence and miscommunication between the stock broker and him and immediately upon noticing the violation the respective shares were sold at a loss of Rs.12,392/-, the AC has unanimously decided to levy a penalty of Rs.25000/- (Rupees twenty five thousands only) for the said violation as a corrective measure and directed Mr. Suraj Kumar Innani to deposit the entire penalty amount of Rs.25000/- (Rupees twenty five thousands only) to the Company's bank account immediately within 7 days i.e on or before 29<sup>th</sup> October 2022.</p> |

| Sr. No. | Particulars  | Details   |
|---------|--|---|
|         |  | <p>The Audit Committee had advised the Company Secretary and Compliance Officer of the Company to issue a warning letter to Mr. Suraj Kumar Innani to strictly adhere to the provisions of the Code and also to remain diligent and be in complete compliance of the Code henceforth to avoid stringent actions for any subsequent violations.</p> <p>Accordingly, warning letter has been issued to him.</p> |
| 6       | Reasons recorded in writing for taking action stated above                         | <p>Mr. Suraj Kumar Innani had admitted that the trades executed by him in violation of the Code read with SEBI ("PIT Regulations") were unintentional and solely because of inadvertence and some miscommunication between the stock broker and him without any malafide intent.</p> <p>He also admitted that he was not in possession of any Unpublished Price Sensitive Information (UPSI).</p>             |
| 7       | Details of the previous instances of violations, if any, since last financial year | First time identification of violation of the Code and the PIT Regulations.   |
| 8       | If any amount collected for Code of Conduct violation(s)                           |   |
|         | i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)                           |   |

|                      | 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 | Details | Bank Name and branch |  | DD Number |  | DD date |  | DD amount (in Rs.) |  |  |
| Particulars          | Details   |             |         |                      |  |           |  |         |  |                    |  |  |
| Bank Name and branch |   |             |         |                      |  |           |  |         |  |                    |  |  |
| DD Number            |   |             |         |                      |  |           |  |         |  |                    |  |  |
| DD date              |   |             |         |                      |  |           |  |         |  |                    |  |  |
| DD amount (in Rs.)   |   |             |         |                      |  |           |  |         |  |                    |  |  |
| 9                    | Any other relevant information  | None        |         |                      |  |           |  |         |  |                    |  |  |

Yours faithfully,

**For Shilpa Medicare Limited**

**RITU**

Digitally signed  
by RITU TIWARY

**TIWARY**

Date: 2022.10.22  
15:24:44 +05'30'

**Ritu Tiwary**

**Company Secretary & Compliance Officer**

**PAN: AGDPT2763Q**

**Email ID: cs@vbshilpa.com**

**Date: 22<sup>nd</sup> October 2022**

**Place: Raichur**