

03<sup>rd</sup> June, 2022

To,  
**BSE Limited**  
1<sup>st</sup> Floor, New Trading Ring,  
Rotunda Building,  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai

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

**Scrip Code - 513269**

**Scrip ID – MANINDS**

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

**Ref.: SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020**

Dear Sir/ Madam,

We refer to the captioned subject and enclose herewith the report on violation relating of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the format of Annexure-A as prescribed by the SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

This is for information and record.

Thanking you,

Yours Truly,

**For Man Industries (India) Limited**



**Jatin Shah**  
Company Secretary

*Encl.: As above*

**Report by Man Industries (India) Ltd. 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	Man Industries (India) Ltd.
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Man Finance Private Limited (MFPL)
	ii. PAN of the DP	AAHCM6681R
	iii. Designation of DP	Not applicable
	iv. Functional Role of DP	Not applicable
	v. Whether DP is Promoter or belongs to Promoter Group	Yes. DP belongs to the Promoter Group of the Company.
	<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	Man Industries (India) Ltd. BSE: 513269 NSE: MANINDS
	ii. No of shares traded and value (Rs.) (Date- wise)	Purchased 1,00,000 (One lakh) Equity shares @ Rs. 73.15/- per share, aggregating Rs. 73,14,840/- (Rupees Seventy Three lakhs Fourteen thousand Eight hundred and Forty only) on 11 <sup>th</sup> May, 2022.
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	



Sr. No.	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	11 <sup>th</sup> May, 2022
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	13 <sup>th</sup> May, 2022
4	Details of violations observed under Code of Conduct	Purchased 1,00,000 equity shares of the Company during the trading window closure period. (Trading window was closed from 1st April, 2022 till the completion of 48 hours from declaration of the Audited Financial Results for the quarter and year ended March 31, 2022)
5	Action taken by Listed company/ Intermediary/ Fiduciary	Warning letter has been issued to the DP imposing penalty of Rs. 1,50,000/- as decided by the Chairman of the Audit Committee. The DP has also been directed not to execute any contra-trade of any number of securities of the Company during the next six months from the end of the month in which, 1,00,000 shares of the Company was purchased by MFPL from open market during the window closure period, i.e. till 30th November, 2022 and shall strictly observe and abide by the Company's Code on Insider Trading and the SEBI (PIT) Regulations at all times, failing which would result in more stringent disciplinary action.
6	Reasons recorded in writing for taking action stated above	The matter was placed before the Audit Committee. After discussion with the committee members, the Chairman of the Audit Committee decided that, though the said transaction took place due to sheer inadvertence as clarified by the DP, however depending on the value and fact that the DP being a promoter group entity has violated the

		Company's Code on Insider Trading and the SEBI (PIT) Regulations, penalty of Rs. 1,50,000/- be imposed on the DP.
7	Details of the previous instances of violations, if any, since last financial year	None
8	If any amount collected for Code of Conduct violation(s)	Rs. 1,50,000/- was collected/received from Man Finance Private Ltd. on 31.05.2022 as penalty towards violation of Company's Code on Insider Trading and the SEBI (PIT) Regulations.
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online
	ii. Details of transfer/payment In case of Online:	
	<b>Particulars</b>	<b>Details</b>
	Name of Transferor	Man Industries (India) Ltd.
	Bank Name, branch and account number	BANK OF INDIA, Andheri Corporate Banking Branch (Mumbai), 011930110000086
	UTR/Transaction reference Number	012210210000008
	Transaction date	02/06/2022
	Transaction Amount (in Rs.)	1,50,000/-
	In case of Demand Draft (DD): NA	
	<b>Particulars</b>	<b>Details</b>
	Bank Name and branch	
	DD Number	
	DD date	
	DD amount (in Rs.)	
9	Any other relevant information	NIL

**For Man Industries (India) Limited**

**Jatin Shah**  
**Company Secretary**

Date: 03.06.2022

Place: Mumbai


*Globally Committed*
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**Delhi Office** : 616, Ansal Chambers - II, 6, Bhikaji Cama Place, New Delhi - 110066.  
 Tel: 011 26711090 • Email : mandelhi@maninds.org

**Anjar Plant** : Pipe & Coating Complex, Plot No.485/2, Anjar - Mundra Highway, Village - Khedoi, Tal - Anjar, Dist - Kutch, Gujarat  
 Tel : +91 - 02836-275751 - 60 • Fax :- +91 2836-275750 • Email : mananjar@maninds.org

**Pithampur Plant** : Pipe & Coating Complex, Plot No.257 - B, 258 - B, Sector 1, Pithampur - 454775, Dist - Dhar (M.P)  
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