

Date: 10<sup>th</sup> June, 2023

**SRL/SE/18/23-24**

**National Stock Exchange of India Ltd**  
Exchange Plaza, Plot no. C/1, G Block,  
Bandra-Kurla Complex, Bandra (East),  
Mumbai- 400 051  
**Symbol: SUNTECK**

**BSE Limited**  
Phiroze Jeejeebhoy Tower,  
Dalal Street,  
Mumbai – 400 001  
**Scrip Code: 512179**

**Sub: Report of violation related to Code of Conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015.**

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

Dear Sir/ Madam,

Pursuant to the captioned subject, we enclose herewith the report of violation related to Code of Conduct formulated under SEBI (Prohibition of Insider Trading) Regulations, 2015, by one of its designated persons, in the format of Annexure A as prescribed by SEBI vide its Circular No: Circular No.: SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

We request you to take the above information on records.

Thanking You.

**For Sunteck Realty Limited**

**Prashant Chaubey**  
**Chief Financial Officer**  
**Encl: a/a**

**Report by Sunteck Realty 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	Sunteck Realty Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input checked="" 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	Rachana Hingarajia
	ii. PAN of the DP	ACSPM6253F
	iii. Designation of DP	Company Secretary
	iv. Functional Role of DP	Compliance Officer
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<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	Sunteck Realty Limited BSE: 512179 NSE: SUNTECK
	ii. No of shares traded and value (Rs.) (Date- wise)	Inadvertently sold 208 equity shares at price of Rs. 294.82/- each aggregating to Rs. 61,322 on 3rd April, 2023
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	No, value of trade was not 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 (PIT) Regulations, 2015	Not Applicable
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	Details of violations observed under Code of Conduct	On 3rd April, 2023, inadvertently 208 equity shares of the Company were sold by the Broker from Mrs. Rachana Hingarajia's demat account on account of margin call during trading window closure period. The trading window was closed from April 01, 2023 till the completion of 48 hours after declaration of the Financial Results for the quarter and year ended March 31, 2023. The results were declared on May 26, 2023 and the trading window opened on May 29, 2023 when the market price at the end of the day was Rs. 285.30
5	Action taken by Listed company/ Intermediary/ Fiduciary	Mrs. Rachana Hingarajia explained that the sale of shares was not a planned trade and the trade has been done inadvertently by her Broker on account of margin call. She reported this incident to the Audit Committee and Board of Directors of the Company, which discussed this matter and decided that a warning letter be issued and also to deposit the loss averted of around Rs. 2,000/- in designated account of SEBI as per the extant provisions.

6	Reasons recorded in writing for taking action stated above	<p>On circumstances as submitted by Mrs. Rachana Hingarajia, the Audit Committee and Board of Directors of the Company took note that the trade was executed inadvertently and unintentionally on account of margin call during the closure of trading window and it recorded the following reasons:</p> <p>a) that the trade was unintentional. b) that there was no intention of violating the provisions of Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> <p>Mrs. Rachana Hingarajia tendered sincere apologies and ensured that she would take utmost care in future.</p>
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)	
	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 the transferor	Rachana Hingarajia
	Bank Name, branch and Account number	Kotak Mahindra Bank, J.B. Nagar Branch and 06640030003265
	UTR/Transaction reference Number	316116389644
	Transaction date	10 June 2023
	Transaction Amount (in Rs)	Rs. 2000/-
9	Any other relevant information	Not Applicable