

GMM/SEC/2020-21/41

October 26, 2020

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
1st Floor, Dalal Street,
Mumbai – 400 001
Scrip Code: 505255

NSE Limited
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex, Bandra (E)
Mumbai – 400 051
Symbol: GMPFAUDLR

Subject: Intimation under Para 12 of Schedule B of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Dear Sir(s),

In accordance with Para 12 of Schedule B of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, (“PIT Regulations”) the Company would like to intimate as under:

1. Mr. Chirag Mehta identified as a ‘Designated Person’ under GMM Pfaudler’s Code of Conduct for Prevention of Insider Trading purchased 7 equity shares of the Company in the first week of October 2020 which falls under the Trading Window Closure period which starts from September 30, 2020 up to 48 hours of the declaration of the unaudited financial results for the quarter and half year ended September 30, 2020. Accordingly, provisions of the PIT Regulations and the Code of Conduct of the Company have been contravened.
2. A show cause notice was issued by the Company on October 15, 2020 for violation of the Code of Conduct for Prevention of Insider Trading of GMM Pfaudler Limited.
3. The noticee vide reply dated October 16, 2020 informed the Company that the aforesaid purchase of shares of the Company during the window closure period was inadvertent.
4. Taking into account all facts and submissions, the Company vide letter dated October 20, 2020 has levied a penalty of Rs. 5,000/- (Rupees Five Thousand only) without prejudice to any other actions as may be initiated by the Securities & Exchange Board of India.

The noticee has made an online payment (IMPS) of Rs. 5,000/- (Rupees Five Thousand Only) to SEBI-IEPF Account No. 012210210000008 maintained with Bank of India, Bandra Kurla Branch, Mumbai on October 20, 2020.

GMM Pfaudler Limited

Corporate Office: 902, Lodha Excelus, Commercial Tower 1, New Cuffe Parade, Sewri - Chembur Road, Mumbai-400022. • O: +91 22 6650 3900

Registered Office & Works: Vithal Udyognagar, Anand - Sojitra Road, Karamsad - 388 325 • O: +91 2692 661700 • F: +91 2692 661888 • CIN : L29199GJ1962PLC001171

sales@gmmpfaudler.com • www.gmmpfaudler.com

Details as required in the format specified vide Circular
No.: SEBI/HO/ISD/ISD/CIR/P/2020/135 July 23, 2020 is also enclosed.

We request you to kindly take the information on record.

Yours faithfully,

For **GMM Pfaudler Limited**



Mittal Mehta
Company Secretary & Compliance Officer

Encl: As above

Report by GMM Pfaudler Limited for violations related to the 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	GMM Pfaudler Limited
2	Please tick appropriate checkbox Reporting in capacity of : <ul style="list-style-type: none"> • Listed Company • Intermediary • Fiduciary 	Listed Company
3.	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Chirag Mehta
	ii. PAN of the DP	AKYPM9279M
	iii. Designation of DP	HR & Admin
	iv. Functional Role of DP	Human Resource (HR) & Admin
	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	GMM Pfaudler Limited
	ii. No of shares traded and value (Rs.) (Date-wise)	Purchase of 7 Equity Shares of face value Rs. 2/- each on October 1, 2020 Total value of Purchase: Rs. 28,509.78
	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/	Not applicable

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	Promoter/ Promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	
	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	Purchase of Equity Shares during trading window closure period.
5.	Action taken by Listed Company/ Intermediary/ Fiduciary	Show cause notice was issued by the Company on October 15, 2020. Penalty of Rs. 5,000/- was levied and subsequently paid on October 20, 2020.
6.	Reasons recorded in writing for taking action stated above	Violation of clause No. 7(i)(a) of the Code of Conduct for Prevention of Insider Trading
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 payment made to SEBI-IPEF
	ii. Details of transfer/payment	
	In case of Online:	
	Particulars	Details
	Name of the transferor	Chirag Mehta
	Bank Name, Branch and Account number	Bank Name: Axis Bank Limited Branch: Vallabh Vidyanagar Account No. 038010100423007
	UTR/Transaction reference Number	775135978
	Transaction date	October 20, 2020
	Transaction Amount (in Rs.)	Rs. 5,000/-
	In case of Demand Draft (DD):	
	Particulars	Details
	Bank Name and branch	Not applicable
	DD Number	-
	DD Date	-
	DD Amount (in Rs.)	-

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9.	Any other relevant information.	-
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Yours faithfully,

For **GMM Pfaudler Limited**



Mittal Mehta
Company Secretary & Compliance Officer

PAN: AFQPD2447B

Email id: mittal.mehta@gmmpfaudler.com

Mobile No.: 98339 05128

Date: October 26, 2020

Place: Mumbai