



VISHNU PRAKASH R PUNGLIA LIMITED

ENGINEER, CONTRACTOR & DESIGNER
An ISO 9001: 2015 Certified Company

February 24, 2024

To, BSE Limited Phiroze Jeejeebhoy Towers, 21 st Floor, Dalal Street, Fort, Mumbai – 400 001 BSE Scrip Code: 543974	To, National Stock Exchange of India Limited Exchange Plaza, Plot No. C/1, Block G, Bandra-Kurla Complex, Bandra (East), Mumbai – 400 051 NSE Scrip Symbol: VPRPL
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Dear Sir/Madam,

Sub: Reporting of violation of VPRPL's Code of Conduct to regulate, monitor and report trading by designated persons and their immediate relatives under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Dear Sir/Madam,

This is to inform you that in terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“the SEBI Regulations”), Vishnu Prakash R Punglia Limited’s Code of Conduct to regulate, monitor and report trading by designated persons and their immediate relatives (“the Code”), and Para 3.2 of SEBI Master Circular No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/039 dated March 23, 2023, the details of 3 instances of violation of the Code by the Designated Persons and immediate relatives of Designated Persons along with the action taken by the Company thereon are enclosed as “Annexure A” to this letter.

You are kindly requested to take the above on record.

For VISHNU PRAKASH R PUNGLIA LIMITED

For Vishnu Prakash R. Punglia Limited
[Signature]

VISHNU PRAKASH PUNGLIA
Chairman & Whole Time Director, **Director**
DIN: 02162019

CIN: U45203MH2013PLC243252

Corporate office: B-31/32, Second Floor, Industrial Estate, New Power House Road, Jodhpur-342003, Rajasthan
Telephone: 0291-2434396, Email: info@vprp.co.in, accounts@vprp.co.in
Reg. Office - Unit No. 3, 5th Floor, B Wing, Trade Star Premises Co-Opeartive Society Limited, Village Kondivita,
Mathuradas Vasanji Road, Near Chakala Metro Station, Andheri (East), Mumbai 400059 Maharashtra



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ANNEXURE A

1. Report by Vishnu Prakash R Punglia Limited for violations related to the Code under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Sr. No.	Particulars	Details
1	Name of Listed Entity	Vishnu Prakash R Punglia Limited
2	Reporting in Capacity of	Listed Company
3	A. Details of Designated Person (DP)	
	Name of the DP	Sarfraz Ahmed
	PAN of the DP	APXPA1774M
	Designation of DP	Chief Financial Officer
	Functional Role of DP	Managing Finance and Accounting division
	Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	Name of the immediate relative of DP	Mrs. Shabnam Sayeed (Spouse of Mr. Sarfraz Ahmed)
	PAN of the immediate relative of DP	BPNPB9576D
	C. Details of transaction(s)	
	Name of the scrip	NSE Symbol- VPRPL, BSE Code- 543974
	No of shares traded and value (Rs.) (Date- wise)	2293 shares sold at a price of Rs.147.0015
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA
4	Details of violations observed under Code of Conduct	1. Pre-clearance approval was not sought for trading/selling of shares; 2. non-submission of post trade intimation to the Company; 3. Contra Trade Violation.
5	Action taken by the Company	The Company has issued a Warning and caution letter to Mrs. Shabnam Sayeed towards the violation of internal code of conduct of the company.
6	Reasons recorded in writing for taking action stated above	The aforesaid action was taken considering the fact that it was Momentary lapse of awareness

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		and was done for the very first time, without the possession of any UPSI and was non-material in nature. The designated person assured that the transaction was undertaken due to lack of awareness and would not be done in future.
7	Details of the previous instances of violations, if any, since last financial year	None. First Time Violation
8	If any amount collected for Code of Conduct violation(s)	NA
	Mode of transfer to SEBI - IPEF (Online/Demand Draft)	NA
	Details of transfer/payment	NA
9	Any other relevant information	None

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2. Report by Vishnu Prakash R Punglia Limited for violations related to the Code under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Sr. No.	Particulars	Details
1	Name of Listed Entity	Vishnu Prakash R Punglia Limited
2	Reporting in Capacity of	Listed Company
3	A. Details of Designated Person (DP)	
	Name of the DP	Nilima Bhansali
	PAN of the DP	AFJPB8483N
	Designation of DP	Independent Director
	Functional Role of DP	Independent Director
	Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	Name of the immediate relative of DP	Mr. Rajendra Bhansali (Spouse of Mrs. Nilima Bhansali, Independent Director of the Company)
	PAN of the immediate relative of DP	AEEPB5877L
	C. Details of transaction(s)	
	Name of the scrip	NSE Symbol- VPRPL, BSE Code- 543974
	No of shares traded and value (Rs.) (Date- wise)	Annexure B
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	Date of intimation of trade(s) by concerned DP/director/promoter /promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA
4	Details of violations observed under Code of Conduct	1. Bought & Sold shares of the Company during trading window closure. 2. Trade done without obtaining PCT 3. Post Intimation of Trade not made.
5	Action taken by the Company	The Company has issued a Warning and caution letter to Mr. Rajendra Bhansali towards the violation of internal code of conduct of the company.
6	Reasons recorded in writing for taking action stated above	The aforesaid action was taken considering the fact that it was Momentary lapse of awareness and was done for the very first time, without the possession of any UPSI and was non-material in

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		nature. The designated person assured that the transaction was undertaken due to lack of awareness and would not be done in future.
7	Details of the previous instances of violations, if any, since last financial year	None. First Time Violation
8	If any amount collected for Code of Conduct violation(s)	NA
	Mode of transfer to SEBI - IPEF (Online/Demand Draft)	NA
	Details of transfer/payment	NA
9	Any other relevant information	None

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ANNEXURE B

INTRADAY TRADING			
Name of the Scrip	Buy/ Sell	Qty	Price
VPRPL	Buy	98	202.10
VPRPL	Buy	91	202.10
VPRPL	Buy	3	202.10
VPRPL	Buy	8	202.10
VPRPL	Buy	95	204.00
VPRPL	Buy	107	203.95
VPRPL	Buy	98	203.95
VPRPL	Sell	50	207.15
VPRPL	Sell	150	207.15
VPRPL	Sell	200	206.65
VPRPL	Buy	500	203.10
VPRPL	Sell	5	202.80
VPRPL	Sell	176	202.80
VPRPL	Sell	10	202.80
VPRPL	Sell	20	202.70
VPRPL	Sell	116	202.70
VPRPL	Sell	200	202.70
VPRPL	Sell	50	202.70
VPRPL	Sell	23	202.70

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3. Report by Vishnu Prakash R Punglia Limited for violations related to the Code under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Sr. No.	Particulars	Details
1	Name of Listed Entity	Vishnu Prakash R Punglia Limited
2	Reporting in Capacity of	Listed Company
3	E. Details of Designated Person (DP)	
	Name of the DP	Neha Matnani
	PAN of the DP	BMBPM0776P
	Designation of DP	Company Secretary & Compliance Officer
	Functional Role of DP	Secretarial Compliance
	Whether DP is Promoter or belongs to Promoter Group	No
	F. If Reporting is for immediate relative of DP	
	Name of the immediate relative of DP	NA
	PAN of the immediate relative of DP	NA
	G. Details of transaction(s)	
	Name of the scrip	NSE Symbol- VPRPL, BSE Code- 543974
	No of shares traded and value (Rs.) (Date- wise)	Sold 20 shares at a price of 212.95
	H. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	Date of intimation of trade(s) by concerned DP/director/promoter /promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA
4	Details of violations observed under Code of Conduct	1. Sold shares of the Company constituting Contra Trade. 2. Trade done without obtaining PCT. 3. Trade done, during the period of Trading Window Closure.
5	Action taken by the Company	The Company has issued a Warning and caution letter to Ms. Neha Matnani towards the violation of internal code of conduct of the company.
6	Reasons recorded in writing for taking action stated above	The aforesaid action was taken considering the fact that it was Momentary lapse of awareness.

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		Further, this was submitted by Compliance Officer that the said trade was done by Share Broker, as a part of compliance of RMS policy to recover the margin money due from other shares at the settlement and was non-material in nature. The designated person assured that the transaction was not initiated by her and would not be done in future.
7	Details of the previous instances of violations, if any, since last financial year	None. First Time Violation.
8	If any amount collected for Code of Conduct violation(s)	NA
	Mode of transfer to SEBI - IPEF (Online/Demand Draft)	NA
	Details of transfer/payment	NA
9	Any other relevant information	None

For ~~VISHNU PRAKASH R PUNGLIA LIMITED~~ **VISHNU PRAKASH R PUNGLIA LIMITED**

 Director

VISHNU PRAKASH PUNGLIA
Chairman & Whole Time Director
DIN: 02162019

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