

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

February 24, 2024

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

Dear Sir/Madam,

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

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. Pungtha Limited

VISHNU PRAKASH PUNGLIA Chairman & Whole Time 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	Sarfaraz 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	No		
	Promoter Group			
	B. If Reporting is for immediate re	lative of DP		
	Name of the immediate relative of DP	Mrs. Shabnam Sayeed (Spouse of Mr. Sarfaraz 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.)	2293 shares sold at a price of Rs.147.0015		
	(Date- wise)			
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter			
	Date of intimation of trade(s) by	NA		
	concerned DP/director/promoter			
	/promoter group to Company under			
	regulation 7 of SEBI (PIT)			
	Regulations, 2015			
	Date of intimation of trade(s) by	NA		
	Company to stock exchanges under			
	regulation 7 of SEBI (PIT)			
4	Regulations, 2015			
4	Details of violations observed under Code of Conduct	 Pre-clearance approval was not sought for trading/selling of shares; non-submission of post trade intimation to the Company; 		
5	Action to L. H. C.	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	The aforesaid action was taken considering the		
	action stated above	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	No	
	Promoter Group		
	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.)	Annexure B	
	(Date-wise)		
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter		
	Date of intimation of trade(s) by	NA	
	concerned DP/director/promoter		
	/promoter group to Company under		
	regulation 7 of SEBI (PIT)		
	Regulations, 2015		
	Date of intimation of trade(s) by	NA	
	Company to stock exchanges under		
	regulation 7 of SEBI (PIT)		
	Regulations, 2015		
4	Details of violations observed under	1. Bought & Sold shares of the Company during	
	Code of Conduct	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	The aforesaid action was taken considering the	
~	action stated above	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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VISHNU PRAKASH R PUNGLIA LIMITED ENGINEER, CONTRACTOR & DESIGNER

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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.

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 Offic Functional Role of DP Secretarial Compliance Whether DP is Promoter or belongs to No Promoter Group 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 Mame of the scrip NSE Symbol- VPRPL, BSE Code- 5439 No of shares traded and value (Rs.) Sold 20 shares at a price of 212.95 (Date- wise) NA H. In case value of trade(s) by NA Concerned DP/director/promoter /promoter group to Company under regulations, 2015 Date of intimation of trade(s) by Company to stock exchanges under regulations, 2015 Insole shares of the Company const Que of Conduct 1. Sold shares of the Company const Code of Conduct 2. Trade done without obtaining PCT. 3.				
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6 Reasons recorded in writing for taking The aforesaid action was taken consider	dering the			
action stated above fact that it was Momentary lapse of awar	-			

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 Pag. Office - Unit No. 3. 5th Floor B Wing Tendo Stop Pageines Co Opposition Society Limited Village Kondivite

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



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

-		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-WISHENNU PRAKESASH RUNGINGCIDIELIMITED

Trog you Director

VISHNU PRAKASH PUNGLIA Chairman & Whole Time Director DIN; 02162019

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