

7th November, 2023

To,

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor, Plot No. C/1, G Block, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051, Maharashtra, India.

Script Symbol: CINELINE

BSE Limited

Corporate Relationship Department 1st Floor, New Trading Ring, PJ Towers, Dalal Street, Fort, Mumbai - 400 001, Maharashtra, India.

Script Code: 532807

Subject: Reporting to Stock Exchanges regarding violation under SEBI (Prohibition of Insider

Trading) Regulations, 2015 relating to the Code of Conduct.

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

Dear Sir/Madam,

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

This is for your information and record.

Thanking you,

Yours' truly,

For Cineline India Limited

Rashmi Shah
Company Secretary & Compliance Officer



Report by Cineline India 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	Cineline India Limited
2.	Please tick appropriate checkbox Reporting in capacity of: - Listed Company - Intermediary - Fiduciary	Listed Company
3.	A. Details of Designated Persons (DP)	
	Name:	Mr. Shantilal Haria
	PAN	AAAPH1924N
	Designation	Independent Director
	Functional Role	Not Applicable
	Whether DP is Promoter or Promoter Group	No
	B. If reporting is for immediate relative of DP	Yes
	Name of the immediate relative of DP	Mrs. Pankti Gangar
	PAN of the immediate relative of DP	AAAPH1923M
	C. Details of transaction(s)	
	Name of scrip	CINELINE INDIA LIMITED
	No. of shares traded and value (Rs.) (datewise)	1. Trade executed on 20 th October, 2023: Purchase of 1,000 (One Thousand only) equity shares @ Rs. 117.0813 per share aggregating to Rs. 1,17,081/-(One Lakh Seventeen Thousand and Eighty One). 2. Trade executed on 23 rd October, 2023: Purchase of 1,000 (One Thousand only) equity shares @ Rs. 110.2621 per share aggregating to Rs. 1,10,262/- (One Lakh



	D. Incase value of trades is more then	Ten Thousand Two Hundred and Sixty Two Only). 3. Trade executed on 26 th October, 2023 : Purchase of 750 (Seven Hundred and Fifty only) equity shares @ Rs. 105.6825 per share aggregating to Rs. 79,261/-(Seventy Nine Thousand Two Hundred and Sixty One Only). Not Applicable
	Rs. 10 lacs in a calender quarter	
i	Date of intimation of trades by concerned DP/ Director/ Promoter/ Promoter group to company under regulation 7 of SEBI (PIT) Regulations, 2015	-
ii	Date of intimation of trades by the company to the Stock Exchanges under 7 of SEBI (PIT) Regulations, 2015	-
4	Details of violations observed under the code of conduct	Mrs. Pankti Gangar, independent married daughter of Mr. Shantilal Haria purchased 2,750 equity shares of Cineline India Limited("Company") in the demat account in which Mr. Shantilal Haria is the second holder during the trading window closure period. (Trading window was closed from 1 October, 2023 till 09 November, 2023 i.e. the completion of 48 hours from the declaration of the un-audited financial results for the quarter and six months ended 30 th September, 2023)
5	Action taken by listed company/intermediary/fiduciary	Warning letter has been issued to the DP imposing a penalty of Rs. 25,000 as decided by the Chairman of the Audit Committee. DP has also been instructed not to execute any contra-trade of any number of securities of the Company within a period of next six months from the end of the month in which 2,750 equity shares were purchased by Mrs. Gangar



6	Reasons recorded in writing for taking action stated above	from the open market during the trading window closure period, i.e. till 25 th April, 2024 and shall strictly observe and abide by the Company's Code on Insider Trading and SEBI (PIT) Regulations at all the times, failing which would result in a more stringent disciplinary action. The matter was placed before the Audit Committee. After discussion with the committee members, the Chairman of the Committee decided that though the said transaction took place due to sheer inadvertence as clarified by the DP, a penalty of Rs. 25,000 be imposed on the
		DP.
7	Details of previous instances if violations, if any, since last financial year	None
8	If any amount collected for Code of Conduct violations	Rs. 25,000 was collected/received from Mr. Shantilal Haria on 07 November 2023 as penalty towards violation of the 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:	
	Particulars	Details
	Name of the Transferor	CINELINE INDIA LIMITED
	Bank Name, branch and Account number	ICICI Bank, Powai Branch, Account No. 002005042955
	UTR/Transaction reference Number	34292590 321DC
	Transaction date	07 November 2023
	Transaction Amount (in Rs.)	25,000
	In case of Demand Draft (DD)	
	Particulars	Details
	Bank Name and branch	Not applicable
	DD Number	



	DD Date	
	DD amount (in Rs,)	
9	Any other relevant information	NIL

For Cineline India Limited

Rashmi Shah
Company Secretary & Compliance Officer