



January 25, 2023

National Stock Exchange of India Ltd.
Exchange Plaza,
C-1, Block G Bandra Kurla Complex
Bandra (E)
Mumbai - 400 051

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai - 400 001

Through: NEAPS

Through: BSE Listing Centre

Dear Sir/Madam,

Sub: Reporting of violations related to the Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015
NSE Scrip Code: ELGIEQUIP / BSE Scrip Code: 522074

With respect to the above subject, enclosed please find the report of violation relating to code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the prescribed form.

Kindly acknowledge receipt of this report and update your records.

Thanking you,

Yours faithfully,

For Elgi Equipments Limited

S Prakash
Company Secretary

Encl: a/a

ELGI EQUIPMENTS LIMITED

Registered Office : Elgi Industrial Complex III, Trichy Road, Singanallur, Coimbatore - 641005, Tamilnadu, India
T +91 422 2589 555, E investor@elgi.com, W www.elgi.com, TOLL-FREE NO: 1800-425-3544 | 1800-203-3544
CIN: L29120TZ1960PLC000351

**Report by Elgi Equipments Limited (listed company) for violations related to Code of Conduct under
SEBI (Prohibition of Insider Trading) Regulations, 2015.**

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of
Insider Trading) Regulations, 2015]

S No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Elgi Equipments Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Subash Ramdoss
	ii. PAN of the DP	AHBPR7569M
	iii. Designation of DP	Head – ME, MBD & Project MK2
	iv. Functional Role of DP	-
	v. Whether DP is Promoter or belongs to Promoter Group	-
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	C. Details of transaction(s)	
	i. Name of the scrip	Elgi Equipments Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	No. of shares: 3 Total consideration: Rs. 1,232/- Date: January 2, 2023
	D. In case value of trade(s) is more than Rs.10 lakhs 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 as the traded value is less than Rs.10 lakhs in the calendar quarter

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	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable as the traded value is less than Rs.10 lakhs in the calendar quarter
4	Details of violations observed under Code of Conduct	(i) Trade during trading window closure period. (ii) Contra trade during the six months period post the previous buy.
5	Action taken by Listed company/ Intermediary/ Fiduciary	Action taken as prescribed by the Code of conduct to regulate, monitor and report trading by the Designated Persons for the second instance of violation: Trade during trading window closure period – 25% of the gross value of transaction Contra trade during the six months period post the previous buy – 25% of the gross value of transaction Fine of Rs. 616/- being 50% (25% + 25%) of the gross value of transaction (Rs.1232/-) was levied and the same was remitted by Mr. Subash Ramdoss to SEBI IPEF on January 20, 2023.
6	Reasons recorded in writing for taking action stated above	The designated person was not in possession of any unpublished price sensitive information. The trade was executed by the depository participant to recover the outstanding dues, which was not paid by the designated person on time. Hence the action taken was commensurate with the violation as detailed in point 4 above.
7	Details of the previous instances of violations, if any, since last financial year	Violation under the Code a) No pre-clearances obtained by him for any trades since 2013 b) Trades during window closure period – during Q2 FY 20 (almost 10 trades – 390 shares at various prices) c) Contra Trade on 1.6.2021 (sale of 730 shares at Rs.208.54/- each) Action taken by the company a) Warning given for the trades done without pre-clearance as it was first instance of violation, and no profits were made.

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		<p>b) Purchase of shares: Total purchase consideration was Rs.43,550 for 390 shares. 50% of the same i.e., Rs.21,775/- was levied and paid as fine.</p> <p>c) Contra trade: The average purchase price of 730 shares prior to sale was Rs.150 per share. Sale Price per share was Rs.209. Difference between sale and purchase price was Rs.59. Amount gained was Rs.42700 and the same was levied as penalty and paid.</p>
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online / Demand Draft
	ii. Details of transfer/payment	
	In case of Online:	
	Particulars	Details
	Name of the transferor	Mr. Subash Ramdoss
	Bank Name, branch and Account number	ICICI Bank, Trichy Road Branch, Coimbatore
	UTR/Transaction reference Number	302011208018
9	Transaction date	January 20, 2023
	Transaction Amount (in Rs.)	Rs. 616/-
9	Any other relevant information	Nil

Yours faithfully,

Date: January 25, 2023

Place: Coimbatore

Name and Signature of Compliance Officer:

For Elgi Equipments Limited

S Prakash

Company Secretary and Compliance Officer

PAN: BQCPS1647A

Email ID: investor@elgi.com

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