

September 04, 2020

**National Stock Exchange of India Limited**

Exchange Plaza, Plot no. C/1, G Block,  
Bandra-Kurla Complex, Bandra (E),  
Mumbai - 400 051  
Trading Symbol: ORIENTELEC

**BSE Limited**

Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Fort, Mumbai – 400 001  
Scrip Code: 541301

**Sub.: Reporting under SEBI (Prohibition of Insider Trading) Regulations, 2015.**

Dear Sir / Madam,

Pursuant to Schedule B read with Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020, we are enclosing herewith the details of violation of the Company's Code of Conduct by the Designated Person along with the action taken by the Company thereon.

We request you to kindly take the above disclosure on your records.

Thanking you,

Yours Sincerely,

For **Orient Electric Limited**

Hitesh Kumar Jain

**Company Secretary**

Encl.: as above

**Report by Orient Electric 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/ <del>Intermediary/Fiduciary</del>	Orient Electric Limited
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input type="checkbox"/> Listed Company    ✓ <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Girish Damani
	ii. PAN of the DP	ADUPD8884E
	iii. Designation of DP	Asst. Manager -Internal Audit
	iv. Functional Role of DP	Internal Audit
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
		<b>Yes</b>
	i. Name of the immediate relative of DP	Madhuri Damani
	ii. PAN of the immediate relative of DP	AJLPD8512E
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	ORIENTELEC
	ii. No of shares traded and value (Rs.) (Date- wise)	As per attachment
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter</b>	
	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
	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	<p>Transactions in No Trading Period (from 13/07/2020 to 29/07/2020) and not following holding period requirement.</p> <p>Girish Damani has resigned from the Company even before the alleged transactions undertaken during the stipulated No Trading Window period. Company accepted his resignation on 06/07/2020 and separated him from his functions, though his notice period ends on 04/09/2020. He has submitted that the transactions were undertaken by his wife unknowingly under the demise of resignation by Girish Damani and it was with no mala-fide intention. He has submitted that he has not counseled his wife for any such transactions. He was even not aware of any such transactions and has sought apology for unintentional transactions.</p>
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>Mr. Girish Damani has been issued a warning instructing not to repeat any such practice in future anywhere.</p>
6	Reasons recorded in writing for taking action stated above	<p>The Management considered the facts of the matter and also the apology sought by Mr. Girish Damani.</p> <p>Mr. Girish Damani had already resigned from</p>

		<p>the Company and was relieved from his functions, before the transactions under investigation were undertaken by his relative, therefore not anticipating to be in possession of any confidential information about the Company.</p> <p>Nevertheless, looking at the number of shares traded, the minuscule amount of profit involved and the absence of malafide intent on the part of his relative, he was issued a warning.</p>																
7	Details of the previous instances of violations, if any, since last financial year	No such previous instance																
8	<p>If any amount collected for Code of Conduct violation(s) :</p> <p>Looking at the small amount of profit involved and the fact of resignation by Mr. Girish Damani, no penalty amount was collected.</p>																	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Not Applicable																
	<p>ii. Details of transfer/payment:</p> <p>In case of Online:</p> <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the Transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and account number</td> <td></td> </tr> <tr> <td>UTR/ Transaction reference no.</td> <td></td> </tr> <tr> <td>Transaction Date</td> <td></td> </tr> <tr> <td>Transaction Amount (Rs.)</td> <td></td> </tr> </tbody> </table> <p>In case of Demand Draft (DD):</p> <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name, branch</td> <td></td> </tr> </tbody> </table>		Particulars	Details	Name of the Transferor		Bank Name, branch and account number		UTR/ Transaction reference no.		Transaction Date		Transaction Amount (Rs.)		Particulars	Details	Bank Name, branch	
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	DD Number		
	DD Date		
	DD Amount (Rs.)		
9	Any other relevant information		

Yours faithfully,  
**For Orient Electric Limited**

**Date** September 4, 2020  
**Place** New Delhi

Saibal Sengupta  
**PAN:** AITPS5733P  
**Email ID:** investor@orientelectric.com

S. No.	Date	Type of Transaction	Quantity	Net Rate per Unit	Net Total (before Levies)	Net Trade Value
1	13.07.2020	Buy	5	176.4	-882	-8820
2		Buy	5	176.4	-882	
3		Buy	40	176.4	-7056	
4	27.07.2020	Buy	50	176.44	-8822	72
5		Sell	-50	177.71	8885.5	
6		Buy	43	176.09	-7571.87	
7		Buy	6	176.09	-1056.54	
8		Buy	1	176.09	-176.09	
9		Sell	-50	176.26	8813	
10	28.07.2020	Buy	7	174.03	-1218.21	160.5
11		Buy	16	174.03	-2784.48	
12		Buy	27	174.03	-4698.81	
13		Buy	16	174.08	-2785.28	
14		Buy	34	174.08	-5918.72	
15		Sell	-50	175.71	8785.5	
16		Sell	-50	175.61	8780.5	
17	30.07.2020	Buy	19	177.6	-3374.4	
18		Buy	81	177.6	-14385.6	
19	31.07.2020	Sell	-100	179.29	17929	17929
		Shares Balance	50		-8418.5	