



**DHABRIYA
GROUP**

DHABRIYA POLYWOOD LIMITED

Regd. Office : B-9D(1), Malviya Industrial Area, JAIPUR-302 017 (Raj.) INDIA

Phone : +91-141-4057171, 4040101-105 | Fax : +91-141-2750814

E-mail : info@polywood.org | Website : www.polywood.org

CIN : L29305RJ1992PLC007003

Ref: BSE/2020-21/07

Date: 20.06.2020

To,
The General Manager
Department of Corporate Service
BSE Limited,
P.J. Towers, Dalal Street,
Fort, Mumbai – 400 001

Scrip Code: 538715

Dear Sir/Madam

**Sub: Report for violations related to Code of Conduct under SEBI (Prohibition of
Insider Trading) Regulations, 2015**

Dear Sir/Madam,

This has reference to SEBI circular no. SEBI/HO/ISD/CIR/P/2019/82 dated 19th July 2019 in relation to Standardizing Reporting of violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find enclosed report for violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by an employee of the Company and action taken by the Company for such violation.

Kindly disseminate the information on the official website of the exchange for the information of all members of the exchange and investors.

Thanking You,

Yours faithfully,

FOR DHABRIYA POLYWOOD LIMITED

Sparsh Jain

Sparsh Jain
Company Secretary
M. No. A36383



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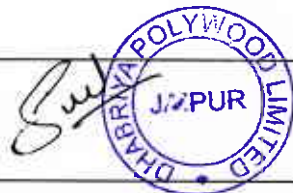
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Report by Dhabriya Polywood Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

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

For Intermediary/Fiduciary: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details
1.	Name of the Listed Company/ Intermediary/Fiduciary	Dhabriya Polywood Limited
2.	Please tick appropriate checkbox Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3.	Name of the Designated Person (DP) Name of the immediate relative of DP if reporting is for immediate relative	Mr. Sourabh Mathur
4.	PAN of the DP PAN of the immediate relative of DP if reporting is for immediate relative	AINPM5369F
5.	Designation of DP	Business Head
6.	Functional Role of DP	Sales and Marketing
7.	Whether DP is Promoter / Promoter Group/ holding CXO level position (e.g. CEO, CFO, CTO etc.)	No
8.	Transaction details	
	a) Name of the scrip	538715 (BSE)
	b) No of shares traded (which includes pledge) and value (Rs) (Date-wise)	28.04.2020 - 150 Shares @ Rs. 27.04 = Rs. 4056/-
9.	In case value of trade(s) is more than Rs 10 lacs in a calendar quarter -	
	a) Date of intimation of trade(s) by concerned DP/director/ promoter/promoter group to Company under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Not Applicable
	b) Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Not Applicable
10.	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015	Sale of securities of the Company by Mr. Sourabh Mathur, identified as Designated Person by the Company when the trading window was closed pursuant





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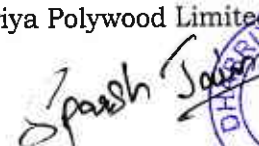

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		Schedule B sub-regulation (1) of Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.
11.	Action taken by Listed Company /Intermediary /Fiduciary	The Company through its Compliance Officer issued warning letter/email to DP & warned him not to do any transaction during the period of trading window closure in future, otherwise Company will be forced to take appropriate action as per regulation /guidelines.
12.	Reasons recorded in writing for taking action stated above	Mr. Sourabh Mathur had expressed that he did not have any malafide intention and these would not be repeated in the future, that he had no intention to violate the Regulations
13.	Details of the previous instances of violations, if any, since last financial year	No
14.	Any other relevant information	NIL

Yours faithfully,
For Dhabriya Polywood Limited

Sparsh Jain

Company Secretary & Compliance Officer

PAN: APXPJ4302C

Email Id: cs@polywood.org

Mobile No: 7877326965

Date: 20.06.2020

Place: Jaipur