KUSAM-MECO®
AN ISO 9001:2015 COMPANY

Kusam Electrical Industries Ltd.
Regd. Office : G-17, Bharat Industrial Estate, T.J.Road, Sewree (W), MUMBAI- 400 015. INDIA.
Tel. Sales Direct Line : (022)24156638
Tel. : (022) 24181649, 24124540
Fax : (022) 24149659
CIN NO. : L31909MH1983PLC220457
Email : sales@kusam-meco.co.in
Website : www.kusamelectrical.com

ISO 9001:2015 Quality Management Sy Cert. No. 13334
JAS-ANZ

Date: 09.02.2022

To,
The Bombay Stock Exchange (BSE) Ltd.
Corporate Services Department,
Phiroze Jeejeebhoy Tower,
Dalal Street, Fort,
Mumbai –400001

BSE Scrip Code – 511048

Subject: Reporting to Stock Exchange regarding violation under SEBI (Prohibition of Insider Trading) Regulation, 2015 relating to the Code of Conduct (CoC)

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

Dear Sir/Madam,

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

Please take the same on record.

Thanking you,

Yours faithfully,
For Kusam Electrical Industries Ltd.

CS Amruta Lokhande
Company Secretary & Compliance Officer

KUSAM ELECTRICAL INDUSTRIES LTD. MUMBAI

Encl: As Above

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Annexure A

Report by Kusam Electrical Industries Ltd 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	Kusam Electrical Industries Ltd
2	Please tick appropriate checkbox Reporting in capacity of : ☐ Listed Company ☐ Intermediary ☐ Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Shree. Jhanwarlal Bhanwarlal Sipani
	ii. PAN of the DP	AAIPS1625B
	iii. Designation of DP	Promoter and Non-Executive Director
	iv. Functional Role of DP	
	v. Whether DP is Promoter or belongs to Promoter Group	Yes. DP belongs to the Promoter Group of the Company
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	Kusam Electrical Industries Ltd BSE Scrip Code – 511048
	ii. No of shares traded and value (Rs.) (Date-wise)	Transfer of 5,500 (Five Thousand Five Hundred) Equity Share through off market transfer on 25th January 2022 by Gift to Mrs Milli Navin Goliya. Sell 6,000 (Six Thousand) Equity Share through off market transfer on 27th January 2022 by Gift to Mrs. Kusum Chandmal Goliya.
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to	Not Applicable, however complied.

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	Company under regulation 7 of SEBI (PIT) Regulations, 2015	
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, however complied.
4	Details of violations observed under Code of Conduct	Transfer of 5500 and 6000 equity share of the company through off market transaction during the trading window closure period. (Trading window was closed From 1st January 2022 till the completion of 48 hours after declaration of un-audited Financial Results for the quarter ended December 31, 2021.
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Audit Committee while taking action against Mr. Jhanwarlal Bhanwarlal Sipani took into consideration the following submission made by him: i. The transfer of 5500 and 6000 Equity Shares of the Company were made through gift to Mrs Milli Navin Goliya and Mrs. Kusum Chandmal Goliya by way of off market transaction during the trading window closure period i.e. 1st January 2022 till the completion of 48 hours after declaration of un-audited Financial Results for the quarter ended December 31, 2021, the violation of Company's Code of Conduct for prevention of Insider Trading was inadvertent and unintentional. ii. The said transfers were inter-share between Promoter/ Promoter Group. The said transfer did not harm or cause prejudice to any investor in securities market. iii. Shri. Jhanwarlal Bhanwarlal Sipani assured that he will abide by the Company's Code of Conduct and will be vigilant in future while dealing in shares of the company during closure of Trading window and whilst in possession of Unpublished price sensitive information.
6	Reasons recorded in writing for taking action stated above	The DP is a part of the Promoter Group of the Company. Notwithstanding the above, the DP is neither involved in any of the decision of the company nor takes part in control of the any affairs of the company and is a DP since he is part of the Promoters Group of the Company. As submitted by him the transfer during the period of closure of trading window was

		entirely inadvertent. However, the same violation in the terms of the provision of the SEBI (Prohibition of Insider Trading) regulations, 2015 and considering all aspect including his submission that he was inadvertently not aware of the closure of trading window and ensure the traansfer at such time was unintentional and also the fact that it is the first case of violation, the Company has taken the aforesaid action.
7	Details of the previous instances of violations, if any, since last financial year	None
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Not Applicable
	ii. Details of transfer/payment	
	Particulars	Details
	Name of the transferor	Not Applicable
	Bank Name, branch and Account number	Not Applicable
	UTR/Transaction reference Number	
	Transaction date	
	Transaction Amount (in Rs.)	
	In case of Demand Draft (DD):	
	Bank Name & Branch	
	DD Number	
	DD Date	
	DD Amount (in Rs.)	
9	Any other relevant information	Shree. Jhanwarlal Bhanwarlal Sipani by his letter dated 03.02.2022 made submission on the violation of Company's Code of Conduct for Prevention of Insider Trading Regulation. He has confirmed that the transfer was inadvertent and unintentional made without intent to violate the company's Insider Trading Policy or the SEBI (Prohibition of Insider trading) Regulation, 2015 and also he was not in possession of any unpublished Price Sensitive Information (UPSI) of the company while making the aforesaid sell of shares.

Date;09.02.2022
Place; Mumbai

Yours faithfully,

Amruta Lokhande
Company Secretary
PAN:BQGPP5863F
Email ID: kusammeco.acct@gmail.com