

5th October, 2020

Ref: SIPL/2020-21/0048

To,
The Dy. Gen Manager
Corporate Relationship Dept.
BSE Limited
P.J. Tower, Dalal Street,
Mumbai- 400 001

To,
National Stock Exchange of India Ltd.
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex, Bandra (E),
Mumbai - 400 051
Fax: 022-26598237-38

Equity Scrip Code: 539346 (BSE)

Equity Scrip Name: SADBHIN (NSE)

Dear Sir/Madam,

Subject: Reporting to Stock Exchanges regarding violation related to Code of Conduct (CoC) under the SEBI (Prohibition of Insider Trading) Regulations, 2015

Reference: SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020

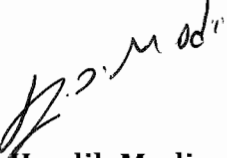
With respect to the above subject and reference, please find enclosed herewith the report by the Company for violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the prescribed form **Annexure -A**.

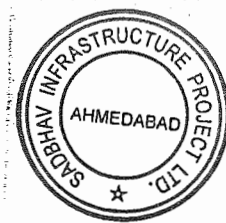
Kindly take the above information on record.

Thanking You,

Yours Faithfully,

For Sadbhav Infrastructure Project Limited


Hardik Modi
Company Secretary
Membership. No. F9193



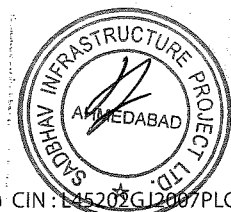
Encl: As Above

Annexure – A

Report by Sadbhav Infrastructure Project Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

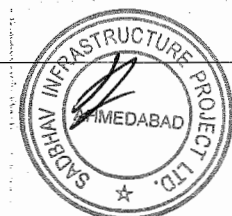
Schedule B read with Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

| Sr. No. | Particulars | Details |
|---------|---|--|
| 1 | Name of the listed company/ Intermediary/Fiduciary | Sadbhav Infrastructure Project Limited |
| 2 | <i>Please tick appropriate checkbox</i> Reporting in capacity of: <input checked="" 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 | Patel Vipul Harishchandra |
| | ii. PAN of the DP | AEQPP9920C |
| | iii. Designation of DP | Part of Promoter Group of Holding Company i.e. Sadbhav Engineering Limited |
| | iv. Functional Role of DP | Resigned as Executive Director of Holding Company i.e. Sadbhav Engineering Limited w.e.f. 24-04-2020 |
| | v. Whether DP is Promoter or belongs to Promoter Group | No Part of Promoter Group of Holding Company i.e. Sadbhav Engineering Limited |
| | 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 | Sadbhav Infrastructure Project Limited – Equity Shares |
| | ii. No of shares traded and value (Rs.) (Date- wise) | 55000 equity shares sold aggregating to Rs. 9,38,358.62 on 01-10-2020 |



| Sr. No. | Particulars | Details |
|---------|--|---|
| | 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 Company under regulation 7 of SEBI (PIT) Regulations, 2015 | 05-10-2020 |
| | ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI(PIT) Regulations, 2015 | 05-10-2020 |
| 4 | Details of violations observed under Code of Conduct | 1. 55000 equity shares sold during trading window closure period by the Designated Person. |
| 5 | Action taken by Listed company/ Intermediary/ Fiduciary | <p>Warning letter has been issued to Patel Vipul Harishchandra, on his e-mail ID registered with Depository Participant that he would not engage in any kind of dealings in the Equity Shares of the Company in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 (Copy attached herewith) and a monetary penalty of Rs. 25,000/- (Rupees Twenty-Five Thousand Only) on the said transaction has been imposed. The aforesaid penalty will be remitted to the Investor Protection and Education Fund of SEBI as and when the same is received from the Designated Person.</p> <p>The designated person has also been provided again with a copy of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015. He has been further advised that in case of any subsequent violation stricter action(s) will be taken by the Company.</p> |

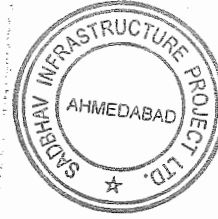
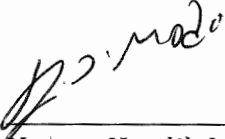
| Sr. No. | Particulars | Details | | | | | | | | | | | | |
|--------------------------------------|--|---|---------|------------------------|--|--------------------------------------|--|----------------------------------|--|--------------------|--|-----------------------------|--|--|
| 6 | Reasons recorded in writing for taking action stated above | <p>In spite of knowing the fact that, the Company has closed trading window for Directors, Employees and Designated Persons, for any kind of dealing in the securities of the Company, Patel Vipul Harishchandra has sold 55000 Equity Shares amounting to total value of Rs. 9,38,358.62 on October 01, 2020 and the same is intimated to the Company on October 05, 2020 via Form-C pursuant to Regulation 7(2) - Continual Disclosure of SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> <p>Further, the Designated Person has been intimated to be extra cautious while executing transactions in future and ensure compliance of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 for himself, immediate relatives and dependents.</p> | | | | | | | | | | | | |
| 7 | Details of the previous instances of violations, if any, since last financial year | NA | | | | | | | | | | | | |
| 8 | If any amount collected for Code of Conduct violation(s) - | The penalty will be remitted via permitted mode to the Investor Protection and Education Fund of SEBI as and when the same is received from the Designated Person and the same will be intimated accordingly. | | | | | | | | | | | | |
| | i. Mode of transfer to SEBI - IPEF (Online/Demand Draft) | - | | | | | | | | | | | | |
| | ii. Details of transfer/payment | | | | | | | | | | | | | |
| | In case of Online: | | | | | | | | | | | | | |
| | <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 Number</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table> | Particulars | Details | Name of the transferor | | Bank Name, branch and Account number | | UTR/Transaction reference Number | | Transaction date | | Transaction Amount (in Rs.) | | |
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| Transaction Amount (in Rs.) | | | | | | | | | | | | | | |
| | In case of Demand Draft (DD): | | | | | | | | | | | | | |
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| DD date | | | | | | | | | | | | | | |
| DD amount (in Rs.) | | | | | | | | | | | | | | |



| Sr. No. | Particulars | Details |
|---------|--------------------------------|---|
| 9 | Any other relevant information | Mr. Vipul Patel has submitted request for Reclassification from Promoter to Public Category vide letter dated 28.08.2020 to the Holding Company i.e. Sadbhav Engineering Limited and Board of holding Company has approved the request in its meeting held on 02.09.2020. |

Yours faithfully,

For Sadbhav Infrastructure Project Limited



Name: Hardik Modi

Designation: Company Secretary and Compliance Officer

PAN: ALSPM8166C & Membership No. F9193

Email ID: hardik.modi@sadbhav.co.in

Date : October 05, 2020

Place : Ahmedabad