



ASTRAL POLY TECHNIK LIMITED

Registered & Corporate Office:
207/1, 'Astral House', B/h Rajpath Club, Off S. G. Highway,
Ahmedabad 380059, Gujarat, India.

P: +91-79 6621 2000 | F: +91-79 6621 2121
E: info@astralpipes.com | W: www.astralpipes.com
CIN: L25200GJ1996PLC029134

January 19, 2021.

BSE Limited

Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai – 400 001
Scrip Code: 532830

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block G
Bandra Kurla Complex, Bandra (East)
Mumbai – 400 051
Trading Symbol: ASTRAL

Dear Sir/Madam,

Sub.: Violation under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 by Designated Person

In term of SEBI Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, please find attached herewith Report by the Company for violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Kindly take the same on your record.

Thanking you,

Yours faithfully,

For Astral Poly Technik Limited

Krunal Bhatt
Company Secretary

Encl.: As above

BRANCHES:
BENGALURU P : 080-26617236 E: bengaluru@astralpipes.com
CHENNAI P : 044-43506384 E: chennai@astralpipes.com
HYDERABAD P : 040-27900023 E: hyderabad@astralpipes.com
JAIPUR P : 0141-2974322 E: jaipur@astralpipes.com
KOCHI P : 0484-2809798 E: kochi@astralpipes.com

MUMBAI P : 022-28389755 E: mumbai@astralpipes.com
NEW DELHI P : 011-26168156 E: delhi@astralpipes.com
LUCKNOW M: 0-6358735733 E: lucknow@astralpipes.com
PUNE M: 0-8446114455 E: pune@astralpipes.com
INDORE M: 0-7974345983 E: indore@astralpipes.com
KOLKATA P : 033-46021104 E: kolkata@astralpipes.com

Report by Astral Poly Technik 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	Astral Poly Technik Limited
2.	Please tick appropriate checkbox 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)	
	Name of DP	Rajeev Somani
	PAN of DP	ABDPS3031R
	Designation of DP	General Manager
	Functional Role of DP	Working in Marketing department of the Company.
	Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	Name of the immediate relative of DP	NA
	PAN of the immediate relative of DP	NA
	C. Details of transactions (s)	
	Name of the scrip	Astral Poly Technik Limited – Equity Shares
	No of shares traded and value (Rs.) (Date- wise)	1. Buy- 400 shares on November 17, 2020. 2. Sold- 400 shares on November 17, 2020.

	D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter.	
	Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015.	January 15, 2021.
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	January 16, 2021.
4.	Details of violations observed under Code of Conduct	Contra trade, trade without pre-clearance of the Compliance officer, and non-reporting the transaction within prescribed time as per SEBI Insider Trading Regulations.
5.	Action taken by Listed company	The Company imposed penalty of Rs. 20,000/- to the Designated Person and asked him to deposit the penalty along with contra trade profit of Rs. 30,146/- to SEBI IPEF.
6.	Reasons recorded in writing for taking action stated above	<p>The Compliance Office on becoming aware of the transaction asked for explanation from the Designated Person. The Designated Person informed the Compliance Officer that the trade was executed by his immediate relative inadvertently without his knowledge.</p> <p>The Compliance Officer in consultation with the Chairman and Managing Director considered the explanation given by the Designated Person and issued warning to Designated Person not to deal in shares of the Company in violation of the SEBI Insider Trading Regulations and Code of Conduct. Being first violation, the Designated Person was imposed penalty of Rs. 20,000/-.</p>

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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)	
	Mode of transfer to SEBI – IPEF Online/Demand Draft)	Online
	Details of transfer/payment	
	In case of Online :	
	Particulars	Details
	Name of the transferor	Rajeev Somani
	Bank Name, branch and Account number	HDFC Bank
	UTR/Transaction reference Number	N018211377552645
	Transaction date	January 18, 2021
	Transaction Amount (in Rs.)	Rs. 50,146/-
In case of Demand Draft (DD):NA.		
	Particulars	Details
	Bank Name and branch	
	DD Number	
	DD date	
	DD amount (in Rs.)	
9.	Any other relevant information	NA

For Astral Poly Technik Limited



Krunal Bhatt
Company Secretary