



19th May, 2021

National Stock Exchange of India Limited (NSE)
Exchange Plaza Bandra-Kurla Complex
Bandra (E), Mumbai-400051
Scrip Code: TWL (EQ)

BSE Limited (BSE)
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai-400001
Scrip Code: 532966

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

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

Madam/Sir,

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) Regulations, 2015 in the format of Annexure-A as prescribed by the SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Please take the same on record.

Thanking you,

Yours faithfully,
For TITAGARH WAGONS LIMITED

Sumit Jaiswal
Company Secretary

Encl.: As Above

TITAGARH WAGONS LIMITED

CIN: L27320WB1997PLC084819

Registered & Corporate Office: Titagarh Towers, 756 Anandapur, E. M. Bypass, Kolkata - 700 107, India
Phone : +91 33 4019 0800 | Fax: + 91 33 4019 0823 | Email : corp@titagarh.in | Web: www.titagarh.in



Annexure - A

Report by Titagarh Wagons 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	Titagarh Wagons 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	A. Details of Designated Person (DP)	
	i. Name of the DP	Smt. Bimla Devi Kajaria
	ii. PAN of the DP	AFXPK8148R
	iii. Designation of DP	Not applicable
	iv. Functional Role of DP	Not Applicable
	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	TITAGARH WAGONS LIMITED NSE – TWL (EQ) BSE – 532966
	ii. No of shares traded and value (Rs.) (Date- wise)	Purchased 10,000 (Ten thousand) Equity shares @ Rs. 47/- per share, aggregating Rs. 4,70,000/- (Rupees Four lakhs seventy thousand only) on 23 rd April, 2021.

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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	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	Purchased 10,000 equity shares of the Company during the trading window closure period. (Trading window was closed from 1 st April, 2021 till the completion of 48 hours after declaration of the Audited Financial Results for the quarter and year ended March 31, 2021)
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The Company by its email/letter to Smt. Bimla Devi Kajaria directed her to pay a monetary penalty of Rs. 50,000/- (Rupees Fifty Thousand only) and asked her to ensure that no further trading/contra-trading/dealing in shares of the Company till 31st January, 2022 is done by her, i.e. for 9 (nine) months from the end of the month in which the purchase of shares was made.</p> <p>Further, she has also been advised to strictly comply with the Insider Trading Regulations and the subject Code of Conduct of the Company and ensure that the same is not violated by her in future and also warned that any non-compliance would result in stringent disciplinary action.</p>
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 decisions of the Company nor takes part in control of any affairs of the Company and is a DP since she is a relative of the promoters. As submitted by her, the purchase of shares by her during the period of closure of Trading Window was entirely inadvertent. However, the same is a violation in terms of the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and considering all aspects including her submission that she was inadvertently not aware of the closure of Trading window and the purchase at such time was unintentional and also the fact that it is the first case of violation, the Company has taken the

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		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)	Online
	ii. Details of transfer/payment	
	In case of Online:	
	Particulars	Details
	Name of the transferor	Titagarh Wagons Limited
	Bank Name, branch and Account number	ICICI Bank 20, R N Mukherjee Road, Rasoi Court Branch, Kolkata – 700001 Account No. - 000651000231
	UTR/Transaction reference Number	CMS/000798207985/TWL170521
	Transaction date	18 th May, 2021
	In case of Demand Draft (DD): N.A.	
Particulars	Details	
Bank Name and branch		
DD Number		
DD date		
DD amount (in Rs.)		
9	Any other relevant information	Smt. Bimla Devi Kajaria by her letter dated 14.05.2021 has deposited amount of Rs. 50,000/- with the Company by a cheque dated 12.05.2021. She has confirmed that the subject purchase was an inadvertent trade made without intent to violate the Company's Insider Trading Policy or the SEBI (Prohibition of Insider Trading) Regulations, 2015 and also she was not in possession of any Unpublished Price Sensitive Information (UPSI) of the Company while making the aforesaid purchase of shares.

Date: 19th May, 2021
Place: Kolkata

Yours faithfully,
For TITAGARH WAGONS LIMITED

Sumit Jaiswal
Company Secretary
PAN: APHPJ7651J
E-mail ID: sumit.jaiswal@titagarh.in

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