

# XPRO INDIA LIMITED



**Registered Office:**

Barjora - Mejia Road, P.O. Ghutgoria,  
Tehsil: Barjora, Distt.: Bankura, West Bengal 722 202  
Tel: +91-9775301701; e-mail: cosec@xproindia.com

CIN: L25209WB1997PLC085972  
Website: www.xproindia.com

November 6, 2019

National Stock Exchange of India Ltd.  
"Exchange Plaza",  
Bandra-Kurla Complex, Bandra (E),  
Mumbai 400 051

**Stock Symbol XPROINDIA(EQ)**

The Dy. General Manager  
Bombay Stock Exchange Limited  
Corporate Relationship Department  
1<sup>st</sup> Floor, New Trading Ring  
Rotunda Building, P J Towers  
Dalal Street, Fort  
Mumbai 400 001

**Stock Code No. 590013**

Dear Sir,

**Sub : Reporting of violations related to code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

With reference to SEBI's Circular No. SEBI/HO/ISD/CIR/P/2019/82 dated July 19, 2019, please find enclosed herewith Report for violations related to code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in prescribed Annexure – A for your kind information and records.

Kindly advise us disposal of amount of fine collected / to be collected from the designated person to enable us to remit the same to the appropriate authority.

Thanking you,

Yours faithfully,  
For XPRO INDIA LTD

**S. C. JAIN**  
Company Secretary &  
Compliance Officer

Encl. A/a

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**Annexure A**

**Report by XPRO INDIA 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]

Sr No	Particulars	Details
1	Name of the listed company	XPRO INDIA 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	Name of the Designated Person (DP) <del>Name of the immediate relative of DP if reporting is for immediate relative</del>	MR. NATARAJAN RAVINDRAN
4	PAN of the DP <del>PAN of the immediate relative of DP if reporting is for immediate relative</del>	AACPN8371M
5	Designation of DP	Joint President (Marketing)
6	Functional Role of DP	Marketing
7	Whether DP is Promoter /Promoter, Group/holding CXO level position (e.g. CEO, CFO, CTO etc.)	No
8	<b>Transaction details</b>	
	a) Name of the scrip	XPRO INDIA LIMITED
	b) No of shares traded (which includes pledge) and value (Rs) (Date-wise)	- Sold 1262 Shares valued Rs. 30,919/- on 10/10/2019.  - Sold 3000 Shares valued Rs. 69,690/- on 14/10/2019.
9	<b>In case value of trade(s) is more than Rs 10 lacs in a calendar quarter –</b> 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 as value of Trade is below Rs.10 Lacs.  - Intimation not required.



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	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	Shares sold in Market during Closure of Trading Window.
11	Action taken by Listed company/ <del>Intermediary</del> /Fiduciary	This being first incident of violation, it was decided to impose a fine of 5% of the traded value rounded off to Rs.5000/- to be deposited with the Company within Seven Days hereof as also Mr. N. Ravindaran shall be ineligible in future participation of Company's Employees Stock Option Plans that may be launched by the Company in next three financial year.
12	Reasons recorded in writing for taking action stated above	The Audit Committee & Board of Directors of the Company reviewed the matter after taking into account explanation furnished by the Designated Person, Mr. N. Ravindaran, Joint President (Marketing) regarding inadvertent sale of shares during closure of Trading Window as he was in need of money.
13	Details of the previous instances of violations, if any, since last financial year	None
14	Any other relevant information	-

Yours faithfully,

S.C. Jain

Name and signature of Compliance Officer

PAN: ACEPJ0795P

Email ID: [scjain@xproindia.com](mailto:scjain@xproindia.com)

Mobile No. 9734222111

Date: November 6, 2019

Place: Kolkata