

14th August, 2021

The Corporate Relationship Dept.,
BSE Limited,
Floor 1, Rotunda Building,
Dalal Street, Bombay - 400 001.

SUB: Report for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015
Scrip Code: 522215

Dear Sir/ Ma'am,

This has reference to SEBI circular no. SEBI/HO/ISD/CIR/P/2019/82 dated 19th July, 2019 in relation to Standardizing Reporting of violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find enclosed report for violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by 2 (two) Designated Persons of the Company and action taken by the Company for such violation.

Kindly take note of the above.

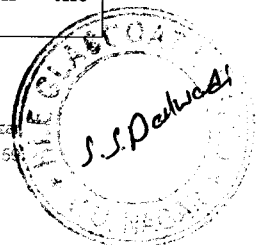
Thanks and Regards,
For **HLE Glascoat Limited**
(Formerly Swiss Glascoat Equipments Limited)

S. S. Dalwadi

Mr. Sachin Dalwadi
Assistant Company Secretary and Compliance Officer

**Report by HLE Glascoat Limited (formerly Swiss Glascoat Equipments Limited)
 for violations related to Code of Conduct under SEBI (Prohibition of Insider
 Trading) Regulations, 2015**
*[Schedule Bread with Regulation 9(1) of SEBI (Prohibition of Insider Trading)
 Regulations, 2015]*

Sr.No.	Particulars	Details
1	Name of the Listed Company	HLE Glascoat 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)	
	i. Name of the Designated Person (DP)	Mr. Bipin Thakkar
	ii. PAN of the DP	AEEPT0332C
	iii. Designation of DP	-
	iv. Functional Role of DP	Consultant
	v. Whether DP is Promoter/Promoter Group/holding CFO level position (e.g. CEO, CFO etc)	No
	B. If Reporting is for immediate relative of DP- Not applicable	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	C. Transaction Details	
	i. Name of the Scrip	HLE Glascoat Limited (BSE) 522215
	ii. No. of Shares traded (which includes pledge) and value (Rs) (Date-wise)	5 th July, 2021 100 shares @ Rs. 3612 = Rs. 3,61,200/-
	D. Incase value of trade(s) is more than Rs 10 lac sin a calendar quarter-	
	i. 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
	ii. Date of Intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Not Applicable
4	Details of Violations observed under Code of Conduct	Violation of Clause 7.1 of the Company's Insider Code of Conduct-
5	Action taken by Listed Company	1. Stringent warning to be issued to Mr. Bipin Thakkar. 2. Penalty of Rs. 25,000 imposed upon DP commensurate with the default committed.



		3. Directed to deposit the disgorged profit of Rs. Rs. 16,260 with the Investor Protection and Education Fund (IPEF) administered by SEBI.												
6	Reasons recorded in writing for taking action stated above	Inadvertent and unintentional violation by sale of Company's shares during closure of trading window, by broker of the DP based on the latter's standing instruction given before the closure of the Company's trading window for sale on getting target price.												
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 Company shall direct that the amount be transferred to SEBI-IPEF by the DP													
	i. Mode of transfer to SEBI IPEF(Online/Demand Draft)													
	ii. Details of transfer/payment-													
In case of Online:														
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9	Any other relevant information	Not Applicable												

Yours faithfully,
 For HLE Glascoat Limited
 (Formerly Swiss Glascoat Equipments Limited)

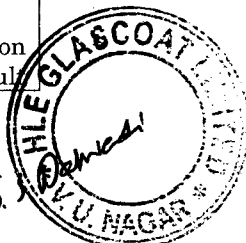
S. S. Dalwadi

Mr. Sachin Dalwadi
 Assistant Company Secretary and Compliance Officer
 PAN: ATSPD0704D
 E-Mail ID: sachin.dalwadi@glascoat.com

**Report by HLE Glascoat Limited (formerly Swiss Glascoat Equipments Limited)
for violations related to Code of Conduct under SEBI (Prohibition of Insider
Trading) Regulations, 2015.**

*[Schedule Bread with Regulation 9(1) of SEBI (Prohibition of Insider Trading)
Regulations, 2015]*

Sr. No.	Particulars	Details
1	Name of the Listed Company	HLE Glascoat 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)	
	i. Name of the Designated Person (DP)	Mr. Yagnesh S Bhatt
	ii. PAN of the DP	AWRPB2636E
	iii. Designation of DP	Dy. Manager-HR
	iv. Functional Role of DP	HR
	v. Whether DP is Promoter/Promoter Group/holding CFO level position (e.g. CEO, CFO etc)	No
	B. If Reporting is for immediate relative of DP- Not applicable	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	C. Transaction Details	
	i. Name of the Scrip	HLE Glascoat Limited (BSE) 522215
	ii. No. of Shares traded (which includes pledge) and value (Rs) (Date-wise)	9 th April, 2021 2 shares @ Rs. 2297.22 = Rs. 4594.44
	D. Incase 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 (Prohibition of Insider Trading) Regulations, 2015	Not Applicable
	ii. Date of Intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Not Applicable
4	Details of Violations observed under Code of Conduct	Violation of Clause 7.1 of the Company's Insider Code of Conduct-
5	Action taken by Listed Company	1. Stringent warning to be issued to Mr. Yagnesh Bhatt 2. Penalty of Rs. 12,500 imposed upon DP commensurate with the default



		committed. 3. Directed to deposit the disgorged Profit of Rs. 36.88 to Investor Protection and Education Fund (IPEF) administered by SEBI.												
6	Reasons recorded in writing for taking action stated above	Sale of shares sold by the DP's broker based on his power of attorney provided for auto pay-in/ pay-out without his express instructions to cover the shortfall in margin in his account during closure of trading window.												
7	Details of the previous instances of violations, if any, since last financial year	Violation of Clause 7.1 of the Company's Insider Code of Conduct based on same reason as above reported by the Company on 16 th October, 2020.												
8	If any amount collected for Code of Conduct violation(s)- The Company has directed the DP to transfer the amounts to SEBI-IPEF.													
	i. Mode of transfer to SEBI -IPEF (Online/Demand Draft)													
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 Assistant Company Secretary and Compliance Officer
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