

October 16, 2020

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 one employee 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)

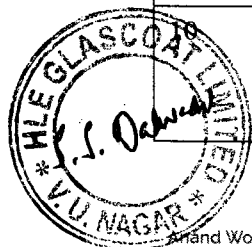
S. S. Dalwadi

Mr. Sachin Dalwadi
Assistant Company Secretary and Compliance Officer

**Report by (Name of the listed company/ Intermediary/ Fiduciary) 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	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	Name of the Designated Person (DP) Name of the immediate relative of DP if reporting is for immediate relative	Mr.Yagnesh S Bhatt
4	PAN of the DP PAN of the immediate relative of DP if reporting is for immediate relative	AWRPB2636E
5	Designation of DP	Dy. Manager-HR
6	Functional Role of DP	HR
7	Whether DP is Promoter/Promoter Group/holding CFO level position (e.g. CEO,CFO etc)	No
8	Transaction Details	
	a) Name of the Scrip	HLE Glascoat Limited (BSE) 522215
	b) No. of Shares traded (which includes pledge) and value (Rs) (Date-wise)	08/10/2020 3 shares @ 1393 = Rs.4179/-
9	In case value of trade(s) is more than Rs 10 lacs in a calendar quarter- 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 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 Not Applicable
	Details of Violations observed under SEBI (Prohibition of Insider Trading) Regulations,2015	Due to shortfall in the margin MOFSL RMS (Risk Management System) Policy



		through whom Mr. Bhatt transacts in shares sold shares of the Company lying in his demat account (Designated Person), when the trading window was closed pursuant to Schedule B read with sub-regulation (1) of Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.
11	Action taken by Listed Company/ Intermediary/Fiduciary	Strict warning has been issued to Mr. Bhatt.
12	Reasons recorded in writing for taking action stated above	Mr. Yagnesh Bhatt has confirmed that he did not have any malafide intention and the shares were sold by his broker based on his power of attorney provided by him for auto pay-in/ pay-out without his express instructions to cover the shortfall in margin in his account.. He has assured the Company that this shall not be repeated and that he shall strictly abide by the the code and policies laid down by the Company.
13	Details of the previous instances of violations, if any, since last financial year	NA
14	Any other relevant information	NA

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