

XPRO INDIA LIMITED



Birla Building (2nd Floor),
9/1, R. N. Mukherjee Road,
Kolkata - 700 001, India

Tel. : +91-33-40823700/22200600
e-mail : xprocal@xproindia.com

July 31, 2020

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
1st Floor, New Trading Ring
Rotunda Building, P J Towers
Dalal Street, Fort
Mumbai 400 001

Stock Code No. 590013

Dear Sir,

Sub : Revised Report for violations related to code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

In continuation to our letter dated November 6, 2019 and with reference to SEBI's Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, please find enclosed herewith **Revised 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.

Further, please be informed that the Company had made necessary disclosure in compliance with the earlier Circular No. SEBI/HO/ISD/CIR/P/2019/82 dated July 19, 2019, to the Stock Exchanges vide its letter dated November 6, 2019. A copy of the same is enclosed herewith for your ready reference. In the **Revised Report** the details of fine collected from the Designated Person, now transferred to SEBI - IPEF account through online mode has been updated.

This is for your information and records.

Thanking you,

Yours faithfully,
For Xpro India Ltd.

Amit Dhanuka
Company Secretary & Compliance Officer

Encl. A/a

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9/1, R. N. Mukherjee Road,
Kolkata - 700 001, India

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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	A Details of Designated Person(DP)	
	i. Name of the Designated Person (DP)	MR. NATARAJAN RAVINDRAN
	ii. PAN of the DP	AACPN8371M
	iii. Designation of DP	Joint President (Marketing)
	iv. Functional Role of DP	Marketing
	v. Whether DP is Promoter or belongs to Promoter Group	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. Details of transaction(s)	
	i. Name of the scrip	XPRO INDIA LIMITED
	ii. 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. -
	D. In case value of trade(s) is more than Rs 10 lacs in a calendar quarter –	Not Applicable as value of Trade is below Rs.10 Lacs.
	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	Intimation not required.
	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



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4	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015	Shares sold in Market during Closure of Trading Window.												
5	Action taken by Listed company/ Intermediary/ 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.												
6	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.												
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)	Yes												
	i. Mode of transfer to SEBI – IPEF	Online												
	ii. Details of transfer /payment													
	In case of online:													
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the Transferor</td> <td>Xpro India Limited</td> </tr> <tr> <td>Bank Name, Branch and Account No.</td> <td>Punjab National Bank Ltd. 135, B.R.B. Road, Kolkata 700 001 Account No: 8700133993</td> </tr> <tr> <td>UTR/Transaction Reference Number</td> <td>PUNBH20212807412</td> </tr> <tr> <td>Transaction Date</td> <td>July 31, 2020</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>5,000/- (Rupees Five Thousand Only)</td> </tr> </tbody> </table>	Particulars	Details	Name of the Transferor	Xpro India Limited	Bank Name, Branch and Account No.	Punjab National Bank Ltd. 135, B.R.B. Road, Kolkata 700 001 Account No: 8700133993	UTR/Transaction Reference Number	PUNBH20212807412	Transaction Date	July 31, 2020	Transaction Amount (in Rs.)	5,000/- (Rupees Five Thousand Only)	
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9	Any other relevant information	-
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Yours faithfully,

A handwritten signature in black ink, appearing to read "Amit Dhanuka".

Date: July 31, 2020

Place: Kolkata

Amit Dhanuka
Name and signature of Compliance Officer
PAN: AHIPD2283R
Email ID: amit.dhanuka@xproindia.com

XPRO INDIA LIMITED



Registered Office:

Barjora - Mejia Road, P.O. Ghugoria,
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
1st Floor, New Trading Ring
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Dalal Street, Fort
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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

XPRO INDIA LIMITED



Registered Office:

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[For listed company: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of
Insider Trading) Regulations, 2015]

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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. NATARAJAN RAVINDRAN
4	PAN of the DP PAN of the immediate relative of DP if reporting is for immediate relative	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	Transaction details	
	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	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	Not Applicable as value of Trade is below Rs.10 Lacs. - Intimation not required.

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Tehsil: Barjora, Distt.: Bankura, West Bengal 722 202
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CIN: L25209WB1997PLC085972
Website: www.xproindia.com

	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/ intermediary/ 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

Mobile No. 9734222111

Date: November 6, 2019

Place: Kolkata