



February 08, 2024

To,

BSE Limited,  
P.J. Towers,  
Dalal Street,  
Mumbai -400 001

**Sub: Intimation as per clause 13 of Schedule B read with Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”)**

Dear Sir / Madam,

Pursuant to clause 13 of Schedule B read with Regulation 9 of PIT Regulations, we wish to inform you that the Company, being an NBFC, deals with price sensitive information relating to its client companies from time to time. In order to curb any unfair trade practices by the Designated Person(s), the Company has imposed a restriction on trading in the securities of its client companies and lenders (“Grey Listed Securities”) as part of its existing Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons & their Immediate Relatives and Connected Persons (“PIT Code”).

However, it has come to our attention that two designated persons of the Company have inadvertently and without access to UPSI, traded in the Grey Listed Securities of the Company during the last quarter. Upon receipt of disclosure from such Designated Persons about the prohibited trades, a show cause notice was issued to them seeking explanation and the same was submitted to the Audit Committee and the Board of Directors of the Company at their respective meetings held on February 07, 2024, for taking appropriate action against the Designated Persons. The Board meeting commenced at 01:30 PM and concluded at 05:30 PM.

The Audit Committee and the Board of Directors have issued strict warnings to the concerned Designated Persons against the prohibited trades as the same was on account of inadvertence and without access to UPSI. The requisite disclosure as per SEBI Circular dated July 23, 2020, as amended from time to time, is provided as **Annexure A**.

Kindly take the same on your record.

For and on behalf of **Vivriti Capital Limited**  
(formerly known as Vivriti Capital Private Limited)

**P S Amritha**  
**CS, CCO & Compliance Officer**  
**Mem No. A49121**  
**Address: Prestige Zackria Metropolitan No. 200/1-8,**  
**2<sup>nd</sup> Floor, Block -1, Annasalai, Chennai – 600002**



Encl: a/a

**Annexure A - Instance - 1**

Sr. No.	Particulars	Instance – 1		
1.	Name of the listed company/ Intermediary/Fiduciary	Vivriti Capital Limited (formerly known as Vivriti Capital Private 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.	<b>A. Details of Designated Person (DP)</b>			
	i. Name of the DP	Jay Dilip Modi		
	ii. PAN of the DP	AOFPM5777B		
	iii. Designation of DP	Lead- Offshore and Capital Markets		
	iv. Functional Role of DP	Treasury		
	v. Whether DP is Promoter or belongs to Promoter Group	No		
	<b>B. If Reporting is for immediate relative of DP</b>			
	i. Name of the immediate relative of DP	NA		
	ii. PAN of the immediate relative of DP	NA		
	<b>C. Details of transaction(s)</b>			
	i. Name of the scrip	UCO Bank – Equity Shares ISIN No: INE691A01018 Scrip Code: 532505		
	ii. No of shares traded and value (Rs.) (Date- wise)	<b>No of shares</b>	<b>Traded Value</b>	<b>Nature of trade</b>
		200	8,260/-	Buy
		200	8,490/-	Sell
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter</b>			
	i. Date of intimation of trade(s) by concerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA		
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA		

Sr. No.	Particulars	Instance – 1
4.	Details of violations observed under Code of Conduct	The Designated Person had traded in the Grey Listed Securities, prohibited from trading, as per its Code of Conduct.
5.	Action taken by Listed company/ <del>Intermediary</del> /Fiduciary	<p>The Audit Committee &amp; Board of Directors have given strict warning to the concerned Designated Person considering that the error is inadvertent and without access to UPSI, and the value of the transaction made (including profits if any) were negligible.</p> <p>The Audit Committee and Board of Directors have directed the Concerned Designated Person to disgorge the profits realized, if any, to the SEBI – IPEF account as per SEBI Circular dated July 23, 2020.</p>
6.	Reasons recorded in writing for taking action stated above	As per the response received from the Concerned Designated Person, the trade had occurred inadvertently and without access to UPSI. The value of transaction made (including profits, if any) were negligible.
7.	Details of the previous instances of violations, if any, since last financial year	NIL
8.	If any amount collected for Code of Conduct violation(s)	NIL. The Audit Committee and Board of Directors have not levied any penalty for the said violation. However, they have directed the Concerned Designated Person to disgorge the profits made, if any. Accordingly, an amount of INR 230/- is transferred to the SEBI – IPEF Account.
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online



Sr. No.	Particulars	Instance – 1
	ii. Details of transfer/payment:	An amount of INR 230 is transferred on February 08, 2024, under UTR NO: SBIN424039323299--SEBI IPEF
9.	Any other relevant information	NA





**Annexure A - Instance - 2**

Sr. No.	Particulars	Instance – 1												
1.	Name of the listed company/ Intermediary/Fiduciary	Vivriti Capital Limited <i>(formerly known as Vivriti Capital Private Limited)</i>												
2.	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company												
3.	<b>A. Details of Designated Person (DP)</b>													
	i. Name of the DP	Monu Dubey												
	ii. PAN of the DP	AWTPD4797J												
	iii. Designation of DP	Lead Private Sector - Treasury												
	iv. Functional Role of DP	Treasury												
	v. Whether DP is Promoter or belongs to Promoter Group	No												
	<b>B. If Reporting is for immediate relative of DP</b>													
	i. Name of the immediate relative of DP	NA												
	ii. PAN of the immediate relative of DP	NA												
	<b>C. Details of transaction(s)</b>													
	i. Name of the scrip	UCO Bank – Equity Shares ISIN No: INE691A01018 Scrip Code: 532505												
	ii. No of shares traded and value (Rs.) (Date- wise)	<table border="1"> <thead> <tr> <th>No of shares</th> <th>Traded Value</th> <th>Nature of trade</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>205.75/-</td> <td>Buy</td> </tr> <tr> <td>363</td> <td>15,023.35/-</td> <td>Buy</td> </tr> <tr> <td>368</td> <td>15,584.80/-</td> <td>Sell</td> </tr> </tbody> </table>	No of shares	Traded Value	Nature of trade	5	205.75/-	Buy	363	15,023.35/-	Buy	368	15,584.80/-	Sell
No of shares	Traded Value	Nature of trade												
5	205.75/-	Buy												
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	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter</b>													
	i. Date of intimation of trade(s) by concerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA												
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA												
4.	Details of violations observed under Code of Conduct	The Designated Person had traded in the Grey Listed												



Sr. No.	Particulars	Instance – 1
		Securities, prohibited from trading, as per its Code of Conduct.
5.	Action taken by Listed company/ <del>Intermediary/</del> Fiduciary	<p>The Audit Committee &amp; Board of Directors have given strict warning to the concerned Designated Person considering that the error is inadvertent and without access to UPSI, and the value of the transaction made (including profits if any) were negligible.</p> <p>The Audit Committee and Board of Directors have directed the Concerned Designated Person to disgorge the profits realized, if any, to the SEBI – IPEF account as per SEBI Circular dated July 23, 2020.</p>
6.	Reasons recorded in writing for taking action stated above	As per the response received from the Concerned Designated Person, the trade had occurred inadvertently and without access to UPSI. The value of transaction made (including profits, if any) were negligible.
7.	Details of the previous instances of violations, if any, since last financial year	NIL
8.	If any amount collected for Code of Conduct violation(s)	NIL. The Audit Committee and Board of Directors have not levied any penalty for the said violation. However, they have directed the Concerned Designated Person to disgorge the profits made, if any. Accordingly, an amount of INR 356/- is transferred to the SEBI – IPEF Account.
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online
	ii. Details of transfer/payment:	An amount of INR 356/- is transferred on February 08, 2024, under UTR NO: SBIN424039322951--SEBI IPEF



Sr. No.	Particulars	Instance – 1
9.	Any other relevant information	NA

