

Date: June 3, 2025

BSE Limited

Department of Corporate Services,
Pheroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor,
Plot No. C/1, G Block
Bandra- Kurla Complex, Mumbai-400051

SCRIP Code- 544136

SYMBOL-RKSWAMY

ISIN: INE0NQ801033

Subject: Reporting of violation of Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons ("Code") under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended ("SEBI PIT Regulations")

Dear Sir/Madam,

We are submitting herewith the Report of Violation under the Company's Code by a Designated Person along with the details of action taken by the Company in this regard in compliance with SEBI PIT Regulations.

Requisite details as per SEBI Master Circular No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/039 dated March 23, 2023 is enclosed herewith as **Annexure - A**.

This is for your information and records.

Thanking you

For R K SWAMY Limited

Aparna Bhat

Company Secretary & Compliance Officer

Membership No.: A19995

Address: Esplanade House, 29, Hazarimal Somani Marg, Fort, Mumbai 400 001

Annexure – A

Report by R K SWAMY Limited for violations related to Code under SEBI (Prohibition of Insider Trading) Regulations, 2015

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/ Intermediary/Fiduciary	R K SWAMY Limited
2.	Please tick appropriate checkbox Reporting in capacity of ☒ Listed Company ☐ Intermediary ☐ Fiduciary	Listed Company
3.	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Sandeep Sharma
	ii. PAN of the DP	Refer Note 1 below
	iii. Designation of DP	Executive Director & President – R K SWAMY MEDIA GROUP
	iv. Functional Role of DP	Executive Director & President – R K SWAMY MEDIA GROUP
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	R K SWAMY Limited BSE: 544136 NSE: RKSWMY
	ii. No of shares traded and value (₹) (Date-wise)	Sold 1500 shares in three tranches on May 23, 2025: 1. 509 shares at Rs. 188.94 (Total Value: Rs. 96,170.46) 2. 491 shares at Rs. 188.42 (Total Value: Rs. 92,514.22) 3. 500 shares at Rs. 187.75 (Total Value: Rs. 93,875)
	D. In case value of trade(s) is more than ₹ 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 (PIT) Regulations, 2015	Not Applicable
	ii.	
	iii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI	Not Applicable

	(PIT) Regulations, 2015													
4.	Details of violations observed under Code of Conduct	Inadvertently Traded in equity shares of the Company during the closure of trading window and hence it is considered as violation.												
5.	Action taken by Listed company/ Intermediary/ Fiduciary	Since the transaction was done out of negligence for the first time, the Audit Committee has issued a warning (without any penalty)												
6.	Reasons recorded in writing for taking action stated above	The transaction was done out of negligence. The volumes and gain had it been transacted the following day was not material. The DP has assured the Audit Committee that this was an act of omission and not deliberate. The Committee also believes that there was no mala-fide intention.												
7.	Details of the previous instances of violations, if any, since last financial year	Not Applicable												
8.	If any amount collected for Code of Conduct violation(s)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Not Applicable												
	ii. Details of transfer/payment	Not Applicable												
	In case of Online:													
	<table><tr><th>Particulars</th><th>Details</th></tr><tr><td>Name of the transferor</td><td></td></tr><tr><td>Bank Name, branch and Account number</td><td></td></tr><tr><td>UTR/Transaction reference Number</td><td></td></tr><tr><td>Transaction date</td><td></td></tr><tr><td>Transaction Amount (in ₹)</td><td></td></tr></table>		Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (in ₹)	
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DD Number														
DD date														
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	Transaction Amount (in ₹)	
9.	Any other relevant information	Not Applicable

Yours Faithfully,

For R K SWAMY Limited

Aparna Bhat

Company Secretary & Compliance Officer

Membership No.: A19995

Address: Esplanade House, 29, Hazarimal Somani Marg, Fort, Mumbai 400 001

Date: 03.06.2025

PAN: Refer Note 1

Email Id: Aparna.bhat@rkswamy.com

Note 1:

In compliance with the Exchange communication dated May 08, 2023, and the provisions of the Aadhaar Act, 2016, PAN details have been intentionally omitted from this disclosure.

Kindly consider this submission complete without the mention of PAN in the PDF announcement.

R K SWAMY LIMITED

Formerly known as "R K Swamy Private Limited"

Esplanade House.

29 Hazarimal Somani Marg,

Fort, Mumbai 400 001.

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Email reachout@rkswamy.com

www.rkswamy.com

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Offices also at Bengaluru, Hyderabad,
Kochi, Kolkata, New Delhi.