

Date: 9th May, 2025

SRL/SE/10/25-26

National Stock Exchange of India Ltd
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex,
Bandra (East), Mumbai - 400 051
Symbol: SUNTECK

BSE Limited
Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai - 400 001
Scrip Code: 512179

Dear Sir/Madam,

Sub: Report of violation related to Code of Conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Ref: SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020

Dear Sir/ Madam,

Pursuant to the captioned subject, we enclose herewith the report of violation related to Code of Conduct formulated under SEBI (Prohibition of Insider Trading) Regulations, 2015, by one of its designated persons, in the format of Annexure A as prescribed by SEBI vide its Circular No: SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

We request you to take the above information on records.

Thanking You.

Yours sincerely,
For Sunteck Realty Limited

Rachana Hingarajia
Company Secretary
(ACS: 23202)

**Report by Sunteck Realty Limited for violations related to Code of Conduct 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	Sunteck Realty 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 DP	SW Capital Private Limited												
	ii. PAN of the DP	*****189K												
	iii. Designation of DP	Promoter												
	iv. Functional Role of DP	Promoter												
	v. Whether DP is Promoter or belongs to Promoter Group	Yes												
	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	Sunteck Realty Limited BSE: 512179 NSE: SUNTECK												
	ii. No of shares traded and value (Rs.) (Date- wise)	<table border="1"> <thead> <tr> <th>Date of Transaction</th> <th>No. of shares</th> <th>Value</th> <th>Nature</th> </tr> </thead> <tbody> <tr> <td>17-12-2024</td> <td>1,600</td> <td>8,21,236</td> <td>Buy</td> </tr> <tr> <td>27-03-2025</td> <td>1,600</td> <td>6,38,267</td> <td>Sell</td> </tr> </tbody> </table> <p>Loss of Rs. 1,82,969</p>	Date of Transaction	No. of shares	Value	Nature	17-12-2024	1,600	8,21,236	Buy	27-03-2025	1,600	6,38,267	Sell
	Date of Transaction	No. of shares	Value	Nature										
	17-12-2024	1,600	8,21,236	Buy										
27-03-2025	1,600	6,38,267	Sell											
D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	No, value of trade was not 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 (PIT) Regulations, 2015	Not Applicable													
ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable													
4	Details of violations observed under Code of Conduct	Contra trade during the six months period post the previous trade.												

Sr. No.	Particulars	Details
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>Based on the written explanation received from Mr. Amit Pitale, Director, SW Capital Private Limited ('SW Capital') i.e. Designated Person, it is observed that the trades executed i.e. buy and sell of 1,600 shares made on 17th December, 2024 and 27th March, 2025, respectively were executed inadvertently which has resulted in net loss of Rs. 1,82,969 to SW Capital. SW Capital had not made any gain on such contra trade and there was no intention of violating the provisions of Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> <p>In this regard, a warning letter was issued by the Company and penalty of Rs. 15,000/- was directed to be deposited in designated account of SEBI as per the extant provisions. This incident shall be reported to the Audit Committee and Board of Directors of the Company.</p>
6	Reasons recorded in writing for taking action stated above	SW Capital is a Promoter Entity. We understand that the day-to-day affairs of SW Capital are managed under supervision of Mr. Amit Pitale, Director of SW Capital. Based on the written explanation received from Mr. Amit Pitale, the trade was executed inadvertently which has resulted in net loss of Rs. 1,82,969 to SW Capital and there was no intention of violating the provisions of Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 or of making any undue gains.
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)	
	i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft)	Online
	ii. Details of transfer/payment	
	In case of Online:	
	Particulars	Details
	Name of the transferor	SW Capital Private Limited
	Bank Name, branch and Account number	Axis Bank Limited, Fort Branch, Mumbai and 922020005472216
	UTR/Transaction reference Number	0109052526441
	Transaction date	9 th May, 2025
	Transaction Amount (in Rs)	Rs. 15,000/-
9	Any other relevant information	Not Applicable