Date: December 17, 2025

To,
BSE Limited
Listing department,
First floor, PJ Towers,
Dalal Street, Fort Mumbai 400 001

Sub: Reporting of violation by Director related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Ref: Scrip code: 538742_____

Dear Sir/ Madam

In terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders (**Code of Conduct**) adopted by Panabyte Technologies Limited ("the Company"), we are submitting the report on intimation and action taken by the Company, for violation of Code of Conduct and the SEBI Regulations read with SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

This is for your information and records.

For Panabyte Technologies Limited

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Harshada Mohite
Company Secretary & Compliance Officer

Encl: As Above

Panabyte Technologies Limited
Corporate Identification Number: L51100MH1981PLC312742

Registered & Corporate Office Address:
Office No. 105, Primus Business Park, Plot No A-195, Road No. 16/A,
Ambika Nagar No. 2, Wagle Industrial Estate, Thane – 400604, Maharashtra, India
Contact No.: +91-8657641575 | Email : info@panachemodera.com
Website : www.panabyte.com

Reporting of Code of Conduct violations under SEBI (Prohibition of Insider Trading) Regulations, 2015

S.No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Panabyte Technologies 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	Narayan Das Mundhra
	ii. PAN of the DP	ADZPM8371J
	iii. Designation of DP	Non-Executive & Non-Independent Director
	iv. Functional Role of DP	Non-Executive & Non-Independent Director
	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	PANABYTE TECHNOLOGIES LIMITED / 538742
	ii. No of shares traded and value (Rs.) (Date-wise)	(see table below)
	D. In case value of trade(s) is 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	Intimation in respect of all the above transactions was provided by the concerned Director to the Company on December 16, 2025.
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Intimation was provided by the Company to the stock exchange on December 17, 2025.

Date of transaction	No. of Shares	Value (INR)	Nature of transaction
08-12-2025	6606	256492.91	Sale
09-12-2025	12894	468194.93	Sale
10-12-2025	4101	148171.15	Sale
11-12-2025	5000	179280.00	Sale

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4	Details of violations observed under Code of Conduct	Mr. Narayan Das Mundhra sold 28601 equity shares from the open market on above-mentioned dates, and failed to intimate the Company within two (2) trading days of the respective transactions, as required under Regulation 7 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code of Conduct for prevention of insider trading, despite clear instructions and reminders issued by the Company. Thus, violating the following clauses of Code of Conduct: Violation under clause 12. (B) of the Code of Conduct for prevention of insider trading -has failed to intimate the Company within two (2) trading days of respective transactions.
5	Action taken by Listed company/ Intermediary/ Fiduciary	Based on written explanation received from the Designated Person (DP), it is observed that the trades executed i.e., sell of 28601 equity shares on above-mentioned dates, were executed inadvertently and failure to prioritise regulatory compliance amid personal/professional exigencies. In this regard, Company has taken the following actions: 1. Issued a stern warning to the DP to refrain from any activities that contravene the Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders adopted by the Company and other applicable regulations including SEBI Prohibition of Insider Trading Regulations 2015, amended from time to time. 2. Penalty: INR 52,607 being 5% of transaction amount to be deposited in IPEF administered by SEBI.
6	Reasons recorded in writing for taking action stated above	As per the Code of Conduct for prevention of insider trading adopted by the Company.
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)	Penalty levied.
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	-
	ii. Details of transfer/payment	Name of the transferor Bank Name, branch and Account Number UTR/Transaction reference Number Transaction date

		Transaction Amount	
9	Any other relevant information	-	