

Date: 7th February 2020

Securities and Exchange Board of India
SEBI Bhavan, Plot No. C4-A, "G" Block,
Bandra Kurla Complex, Bandra €,
Mumbai-400 051.
Tel.: 2644 9950/4045 9950

BHARTIYA INTERNATIONAL
LIMITED
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New Delhi Capital Region
India
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E bhartiya@bhartiya.com

CIN L74899TN1987PLC111744

www.bhartiya.com

SUB.: DISCLOSURE

Dear Sir/Madam,

This is in reference to the SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2019/82 dated 19th July 2019 on Standardizing Reporting of violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find attached Annexure-A of Bhartiya International Limited in the prescribed format.

We would humbly like to state that this trade was executed by the Depository Participant - Kotak Securities, for recovering some debit. We are attaching the mail also received from the DP for your information.

Since this was inadvertent mistake, we request you to please not treat this case as a violation of the aforesaid regulations.

Please take the above on record.

Thanking you,

Yours Sincerely,
For Bhartiya International Limited


Shilpa Budhia
(Company Secretary)



CC to:

The Vice-President, Listing Department, National Stock Exchange of India Ltd. Exchange Plaza, 5 th Floor, Plot No. - C/1, G Block, Bandra - Kurla Complex, Bandra (E), Mumbai - 400051 Fax - 022-26598237/38	The General Manager, Listing Department, BSE Limited, Floor -25, Phiroze Jeejeebhoy Tower, Dalal Street, Mumbai- 400001 Fax - 022-22722037/39/41/61
NSE Symbol: BIL/EQ	Scrip Code: 526666

Annexure A

Report by (Name of the listed company/ Intermediary/Fiduciary) 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
For Intermediary/ Fiduciary: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr No	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Bhartiya International Limited (the Company)
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of: <input 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.	Bhartiya Advisory Services Private Limited
4	PAN of the DP PAN of the immediate relative of DP if reporting is for immediate relative.	AACCB6823H
5	Designation of DP	Private Company
6	Functional Role of DP	-
7	Whether DP is Promoter /Promoter Group/holding CXO level position (e.g. CEO, CFO, CTO etc.)	Promoter Group
8	Transaction details	
	a) Name of the scrip	BIL
	b) No of shares traded (which includes pledge) and value (Rs) (Date- wise)	No. of shares - 13 Value of shares - Rs. 2171.40
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 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	Due to inadequate balance, the DP sold off 13 shares of the Company at Rs. 2171.40, to recover the outstanding amount without informing us, resulting in inadvertent violation of the SEBI Regulations.
11	Action taken by Listed company/ Intermediary/ Fiduciary	Not applicable
12	Reasons recorded in writing for taking action stated above	Not applicable
13	Details of the previous instances of violations, if any, since last financial year	Nil
14	Any other relevant information	Since it was an inadvertent mistake, kindly do not treat it as non-compliance

Yours faithfully,

Signature *Shilpa Budhia*
 Name of Compliance Officer: Shilpa Budhia
 PAN: AGKPS0835P
 Email id: shilpa.budhia@bhartiya.com
 Mobile Number: 8826344880
 7th February 2020, Gurugram



Pardeep Sharma

From: U.S.Kini
Sent: Friday, February 7, 2020 9:57 AM
To: Pardeep Sharma
Cc: Deepak Goyal; Kasim Ansari
Subject: FW: Debtor's Liquidation

-----Original Message-----

From: backoffice.system@kotaksecurities.com <backoffice.system@kotaksecurities.com>
Sent: Thursday, February 6, 2020 5:31 PM
To: U.S.Kini <us.kini@bhartiya.com>
Subject: Debtor's Liquidation

Date : Feb 06 2020

Dear Client,

This is in continuation to our earlier Debit mailers for your account with Kotaksecurities.com:- EY144 We wish to inform you that outstanding debit has not been cleared. As per our Debtor's policy your following scrips have been squared to recover debit:

ITMS Order no	SCRIP	B/S	QTY	VALUE
2200206065496.000000	OIL AND NATURAL GAS CORP.	S	1	106.55
2200206065490.000000	BHARTIYA INTERNATIONAL	S	13	2171.40

For assistance, you are requested to get in touch with our customer care department on 1800 209 9191 (toll free) / 30305757 (prefix your city STD code) / 1800 22 22 99 (toll free)

Fax Number: 022-67256749

Please do not reply to this e-mail address. Kindly post your queries to service.securities@kotak.com only.

Assuring you the best of services always.

Regards,
Risk Management Team,
Kotaksecurities.com