



**Date: September 29, 2025**

To,  
The Manager  
Listing Department  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai-400001

**Scrip Code: 544199**

**Scrip ID: GEMENVIRO**

**Subject: Reporting of violation related to SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code of Conduct of the Company made thereon**

Dear Sir/ Ma'am,

This is with reference to the SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 ("SEBI Circular"), the Company hereby report violation related to SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code of Conduct of the Company made thereunder, by one of the Designated Person of the Company.

Further, the details of the violation as per the SEBI Circular is enclosed and marked as **Annexure A**.

Kindly take the same on your record and bring notice to all the concerned.

**For GEM Enviro Management Limited**

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**Tripti Goyal**  
**Company Secretary and Compliance Officer**  
**Membership No.: ACS73180**

**Encl:** as above

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## **GEM ENVIRO MANAGEMENT LIMITED**

(Formerly Known as GEM Enviro Management Private Limited)

Waste Management Agency (WMA)

Reg. Office : Unit no.203, Plaza- 3, Central Square, Bara Hindu Rao, Delhi- 110006, Ph. No. 011-49068377

Email : [info@gemrecycling.com](mailto:info@gemrecycling.com), Web : [www.gemrecycling.com](http://www.gemrecycling.com), CIN No. : L93000DL2013PLC247767



## Annexure A

### Report by GEM Enviro Management 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/ <del>Intermediary/Fiduciary</del>	GEM Enviro Management Limited
2	Please tick appropriate checkbox Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr. Nishant Sharma
	ii. PAN of the DP	DNJPS2838K
	iii. Designation of DP	-
	iv. Functional Role of DP	-
	v. Whether DP is Promoter or belongs to Promoter Group	Yes, part of the Promoter Group
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	GEMENVIRO / 544199
	ii. No of shares traded and value (Rs.) (Date- wise)	25/09/2025: Sold 800 Equity Shares for Rs. 50,360/-
	<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	Not Applicable, Value of trade is less than Rs. 10 Lacs in the calendar quarter
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, Value of trade is less than Rs. 10 Lacs in the calendar quarter

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4	Details of violations observed under Code of Conduct	<p>Contra Trade</p> <p>Mr. Nishant Sharma has acquired the 800 Shares of the Company on March 27, 2025 at Rs. 82.67/- per share and sold the 800 shares of the Company on September 25, 2025 at Rs. 62.95/- per share inadvertently and no malafide intention were involved.</p> <p>Mr. Sharma was not holding any Unpublished Price Sensitive Information and sold the shares when trading window was open.</p>
5	Action taken by Listed company/ <del>Intermediary/</del> <del>Fiduciary</del>	Appropriate action will be discussed in the ensuing meeting of the Audit Committee of the Company and the same shall be intimated to the stock exchange once decided by the Audit Committee.
6	Reasons recorded in writing for taking action stated above	Violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code of Conduct made thereunder.
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)	Not Applicable

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ii. Details of transfer/payment in case of online: Not Applicable		
<b>Particulars</b>	<b>Details</b>	
Name of the transferor	Not Applicable	
Bank Name, branch and Account number		
UTR/Transaction reference Number		
Transaction date		
Transaction Amount (in Rs.)		
In case of Demand Draft (DD):		
<b>Particulars</b>	<b>Details</b>	
Bank Name and branch	Not Applicable	
DD Number		
DD date		
DD amount (in Rs.)		
9	Any other relevant information	

Yours faithfully,

**For GEM Enviro Management Limited**

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**Tripti Goyal**  
**Company Secretary and Compliance Officer**  
**Membership No.: ACS73180**  
**PAN: CYAPG4602E**  
**Email: [cs@gemrecycling.com](mailto:cs@gemrecycling.com)**

**Date: September 29, 2025**  
**Place: Delhi**

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