



Date: November 14, 2025

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

Scrip Code: 544199

Scrip ID: GEMENVIRO

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

Dear Sir/ Ma'am,

In continuation to our earlier reporting dated September 29, 2025, wherein, the Company reported the incident of violation of 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, we wish to inform you that the Audit Committee of the Company, at their meeting held today i.e., Friday, November 14, 2025, has taken a note of the said reported violation.

Further, the disclosure pertaining to update on the matter is enclosed and marked as **Annexure A**.

Kindly take the same on your record.

For GEM Enviro Management Limited

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

Encl: as above

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, Web : 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/ Intermediary/Fiduciary	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	A. Details of Designated Person (DP)	
	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. 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	GEMENVIRO / 544199
	ii. No of shares traded and value (Rs.) (Date- wise)	25/09/2025: Sold 800 Equity Shares for Rs. 50,360/-
	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	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/ Intermediary/ Fiduciary	<p>As soon as the Company became aware of the violation, the Company requested an explanation from Mr. Sharma.</p> <p>The explanation given by Mr. Sharma was placed before the Audit Committee. Based on that explanation and considering the fact that it was a first instance of violation, the Audit Committee in its Meeting held today, i.e., November 14, 2025 has decided to issue a warning letter to Mr. Sharma. The letter instructs him to ensure the compliance of SEBI PIT Regulations and refrain to engage in any kind of dealings in the Equity Shares of the Company, which is in violation of the Company's Code of Conduct and SEBI PIT Regulations.</p>

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6	Reasons recorded in writing for taking action stated above	The action stated above was taken after considering the fact that it was the first instance of inadvertent violation and Mr. Sharma had no access to any Unpublished Price Sensitive Information (UPSI) at the time of the trade.								
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- IEPF(Online/Demand Draft)	Not Applicable								
	ii. Details of transfer/payment in case of online: Not Applicable									
	<table><tr><th>Particulars</th><th>Details</th></tr><tr><td>Name of the transferor</td><td rowspan="5">Not Applicable</td></tr><tr><td>Bank Name, branch and Account number</td></tr><tr><td>UTR/Transaction reference Number</td></tr><tr><td>Transaction date</td></tr><tr><td>Transaction Amount (in Rs.)</td></tr></table>	Particulars	Details	Name of the transferor	Not Applicable	Bank Name, branch and Account number	UTR/Transaction reference Number	Transaction date	Transaction Amount (in Rs.)	
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	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

Tripti Goyal
Company Secretary and Compliance Officer
Membership No.: ACS73180
PAN: CYAPG4602E
Email: cs@gemrecycling.com

Date: November 14, 2025

Place: Delhi

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