



Date March 27, 2026

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 March 09, 2026, 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, March 27, 2026, 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
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Tripti Goyal
Company Secretary and Compliance Officer
Membership No.: ACS73180

Encl: as above

GEM ENVIRO MANAGEMENT LIMITED

Registered Office: Unit No. 203, Plaza-3, Central Square, Bara Hindu Rao, Delhi-110006, Ph. No.: 0120-4923132
Corporate Office: 3rd Floor, A-115, Noida-Greater Noida Expressway, Sector-136, Noida, Uttar Pradesh-201304
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. Rakesh Chandra Pareek
	ii. PAN of the DP	AAGPP6613G
	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)	March 02, 2026: Sold 29,600 Equity Shares for Rs. 12,51,720/- Details of the sales transaction are as follows: 10,400 Equity shares @ Rs. 42.45 9,600 Equity shares @ Rs. 42.30 9,600 Equity shares @ Rs. 42.10 March 06, 2026: Bought 29,600 Equity shares for Rs. 11,96,840/- Details of the purchase transaction are as follows: 20,000 Equity shares @ Rs. 40.75 8,000 Equity shares @ Rs. 39.75 1,600 Equity shares @ Rs. 39.90

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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
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	<p>Contra Trade</p> <p>Mr. Rakesh Chandra Pareek has sold the 29,600 Equity shares of the Company on March 02, 2026 and subsequently, acquired 29,600 Equity shares of the Company on March 06, 2026 inadvertently and no malafide intention were involved.</p> <p>Mr. Rakesh was not holding any Unpublished Price Sensitive Information and transactions executed when the 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. Rakesh Chandra Pareek.</p> <p>The explanation given by Mr. Rakesh 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., March 27, 2026 has decided to issue a warning letter to Mr. Rakesh. 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>
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. Rakesh 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

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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	
	Particulars	Details
	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):	
	Particulars	Details
	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


 Digitally signed by TRIPTI GOYAL
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Tripti Goyal
Company Secretary and Compliance Officer
Membership No.: ACS73180

Date: March 27, 2026

Place: Noida

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