

February 10, 2025

National Stock Exchange of India Ltd., Exchange Plaza, C-1 Block G, Bandra Kurla Complex Bandra [E], Mumbai – 400051	BSE Ltd., Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001
NSE Scrip Symbol: BLSE	BSE Scrip Code: 544107

Dear Sir/Madam,

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

In continuation of our earlier reporting on January 03, 2025, wherein, the Company intimated the incident of violation of the Code of Conduct under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, we wish to inform you that the Audit Committee of the Company, at their meeting held today, has taken a note of the said reported violation related to Code of Conduct under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Disclosure pertaining to update on the matter is enclosed as **Annexure A**.

You are hereby requested to take the same in your records.

For BLS E-Services Limited

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Sameer Kumar
Company Secretary and Compliance Officer
Membership No. - A32216

Encl: as above

Annexure A

Report by BLS E-SERVICES 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	BLS E-SERVICES 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. Shiv Kumar Yadav
	ii. PAN of the DP	ACJPY1712E
	iii. Designation of DP	Director in Aadifidelis Solutions Private Limited, Material Subsidiary of the Company
	iv. Functional Role of DP	Whole-time 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	Mrs. Preeti Mahendra Dudhediya
	ii. PAN of the immediate relative of DP	AIMPD1033C
	C. Details of transaction(s)	
	i. Name of the scrip	BLSE / 544107
	ii. No of shares traded and value (Rs.) (Date - wise)	13/12/2024: Purchased 45689 Equity shares for Rs. 97,31,757/-
	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	02/01/2025
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	03/01/2025
4.	Details of violations observed under Code of Conduct	Mrs. Preeti Mahendra Dudhediya has acquired equity shares of the Company (as mentioned above) without obtaining Pre Clearance order and delayed in filing of requisite disclosure to the Company pursuant to the SEBI (PIT) Regulations 2015 and code of the

		<p>Company thereon.</p> <p>Mrs. Dudhediya was not holding any UPSI and acquired 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 had asked explanation from the immediate relative of the DP.</p> <p>The explanation given by the immediate relative of DP was placed before the Audit Committee. Audit Committee in its Meeting held on February 10, 2025 has decided to issue a warning letter regarding the violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“SEBI PIT Regulations”).</p> <p>Accordingly, the Company had issued the warning letter to not 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 and also ensure the compliance of SEBI PIT Regulations.</p> <p>The designated person and his immediate relative has also been provided again with a copy of Code of Conduct of the Company.</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 Mrs. Dudhediya 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	N.A.
8.	If any amount collected for Code of Conduct violation(s)	N.A.
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	N.A.

ii. Details of transfer/payment in case of Online: N.A.	
Particulars	Details
Name of the Transferor	N.A.
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 and Branch	N.A.
DD Number	
DD Date	
DD Amount (in Rs.)	
9.	Any other relevant information

For BLS E-Services Limited

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Sameer Kumar
Company Secretary and Compliance Officer
Membership No. - A32216

Date: February 10, 2025
Place: Delhi