

May 11, 2023

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	Metropolitan Stock Exchange of India Ltd., Vibgyor Towers, 4 th Floor, Plot No. C62, G - Block, Opp. Trident Hotel, Bandra Kurla, Complex, Bandra (E), Mumbai – 400098
NSE Scrip Symbol: BLS	BSE Scrip Code: 540073	MSE Scrip Symbol: BLS

Dear Sir/Madam,

Sub: Update on violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

In continuation of earlier reporting on the captioned subject submitted by the Company on April 05, 2023, 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 enclosed as **Annexure A**.

You are requested to take the same on record.

For **BLS International Services Limited**

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Dharak A. Mehta
Company Secretary and Compliance Officer
ICSI Membership No.: ACS40502

Encl: as above

Annexure A

Report by BLS INTERNATIONAL 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 INTERNATIONAL 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. Gaurav Aggarwal
	ii. PAN of the DP	AGUPA3941Q
	iii. Designation of DP	Promoter
	iv. Functional Role of DP	Promoter
	v. Whether DP is Promoter or belongs to Promoter Group	Promoter
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Mrs. Ruchita Gaurav Aggarwal
	ii. PAN of the immediate relative of DP	ALVPS1075P
	C. Details of transaction(s)	
	i. Name of the scrip	BLS / 540073
	ii. No of shares traded and value (Rs.) (Date - wise)	14/03/2023: Purchased 3200 Equity shares for Rs. 4,99,200/-
		15/03/2023: Purchased 3070 Equity shares for Rs. 4,99,089.90/-
		16/03/2023: Purchased 3130 Equity shares for Rs. 4,95,792/-
		17/03/2023: Purchased 3147 Equity shares for Rs. 4,99,900.95/-
	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	05/04/2023

	DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	05/04/2023
4.	Details of violations observed under Code of Conduct	<p>Mrs. Ruchita Aggarwal has acquired 12,547 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 Company thereon.</p> <p>Mrs. Aggarwal was not holding any UPSI and acquired shares when trading window was open.</p>
5.	Action taken by Listed company/ Intermediary/ Fiduciary	<p>Warning letter has been issued to the Mrs. Ruchika Aggarwal that she would 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 (Prohibition of Insider Trading) Regulations, 2015 and also ensure the compliance of the same by Designated person and his immediate relatives.</p> <p>The designated person and his immediate Relative has also been provided again with a copy of Code of Conduct along with presentation on compliance of SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>
6.	Reasons recorded in writing for taking action stated above	The action stated above was taken after considering the fact that first instance of inadvertent violation made by DP erroneously in placing the order on exchange.
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.									
	<table border="1"> <thead> <tr> <th data-bbox="358 405 881 443">Particulars</th> <th data-bbox="881 405 1398 443">Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="358 443 881 480">Name of the Transferor</td> <td data-bbox="881 443 1398 480" rowspan="5">N.A.</td> </tr> <tr> <td data-bbox="358 480 881 552">Bank Name, Branch and Account Number</td> </tr> <tr> <td data-bbox="358 552 881 590">UTR/Transaction reference Number</td> </tr> <tr> <td data-bbox="358 590 881 627">Transaction Date</td> </tr> <tr> <td data-bbox="358 627 881 665">Transaction Amount (in Rs.)</td> </tr> </tbody> </table>		Particulars	Details	Name of the Transferor	N.A.	Bank Name, Branch and Account Number	UTR/Transaction reference Number	Transaction Date	Transaction Amount (in Rs.)
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9.	Any other relevant information									

For BLS International Services Limited

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Dharak A. Mehta
Company Secretary and Compliance Officer
Membership No.: ACS40502