



# Precision Electronics Limited

Dated: March 28, 2024

**Bombay Stock Exchange Limited**  
25<sup>th</sup> Floor, P J Towers,  
Dalal Street,  
Mumbai 400 001

**Stock Code: 517258**

**Sub: Intimation of sale of shares by "Knowledge Holdings & Investments Pte. Ltd.",  
(Promoter group entity)**  
**Ref.: SEBI (Prohibition of Insider Trading) Regulations, 2015**

Dear Sir/Madam,

This is to intimate the stock exchange that according to the BENPOS received by the Company from "Skyline Financial Services Private Limited", (RTA of the Company), "Knowledge Holdings and Investments Pte. Ltd.", (Promoter group entity) sold 20,000 equity shares of the Company for the period from January 26, 2024 to February 2, 2024.

Thereafter, the Company vide email dated March 5, 2024, notified "Knowledge Holdings and Investments Pte. Ltd." of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 by executing sale of aforesaid shares and to ascertain the reason of sale of shares together with date of execution and amount of transaction.

"Knowledge Holdings and Investments Pte. Ltd.", vide email dated March 27, 2024 responded to the Company that it was an inadvertent mistake and take full cognizance of the mistake and has assured that it will not happen again.

*Since the value of transaction is more than Rs. 10 lakhs, Form C is attached for reference comprising of details of the transaction that the total value of sale of 20,000 equity shares is Rs.12,99,800/-, executed on January 30, 2024.*

The matter will be placed in the coming Audit and Board meeting of the Company. Please take note of same.

Thanking you,  
Sincerely yours

  
Veerita Khurana  
Company Secretary cum  
Compliance Officer



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D-10, Sector-3, Noida 201301,  
Gautam Buddha Nagar, Uttar Pradesh, India  
Tel.: +91-120-2551556 / 1557 / 5176 / 5177  
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**Registered Office**  
D-1081, New Friends Colony,  
New Delhi-110025

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CIN: L32104DL1979PLC009590,UDYAM-UP-28-0002995



# Precision Electronics Limited

## Report by Precision Electronics Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

For Intermediaries/ Fiduciaries: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr No.	Particulars	Details		
1.	Name of the listed company/ <b>Intermediary/Fiduciary</b>	Precision Electronics Limited		
2.	Please tick appropriate checkbox Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company		
3.	<b>A. Details of Designated Person (DP)</b>			
	i. Name of the DP	Knowledge Holdings & Investments Pte. Ltd.		
	ii. PAN of the DP	AAECK5509P		
	iii. Designation of DP	N.A.		
	iv. Functional Role of DP	N.A.		
	v. Whether DP is Promoter or belongs to Promoter Group	Yes		
	<b>B. If Reporting is for immediate relative of DP</b>			
	i. Name of the immediate relative of DP	N.A.		
	ii. PAN of the immediate relative of DP	N.A.		
	<b>C. Details of transaction(s)</b>			
	i. Name of the scrip	Precision Electronics Limited		
	ii. No of shares traded and value (Rs.) (Date- wise)	No. of Equity Shares Traded	Date of Transaction	Value of Trade (INR)
		20,000 (Sold)	30.01.2024	12,99,800/-
	<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	<p>The Company on checking benpos data, identified sale of shares by "Knowledge Holdings and Investments Pte. Ltd.", (Promoter group entity) for the period from January 26, 2024 to February 2, 2024.</p> <p>Thereafter, the Company vide email dated March 5, 2024, notified "Knowledge Holdings and Investments Pte. Ltd." of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 by executing sale of aforesaid shares.</p> <p>"Knowledge Holdings and Investments Pte. Ltd.", vide their email dated March 27, 2024 responded to the Company that it was an inadvertent mistake and take full cognizance of the mistake and has assured that it will not happen again. Since the value of transaction is more than Rs. 10 lacs, Form C is also submitted.</p>			

	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	The Company has intimated to the stock exchange on March 28, 2024 of the violation. Since the trade value was more than the prescribed value of Rs. 10 Lacs, therefore Form C is also attached with the covering letter.
4.	<b>Details of violations observed under Code of Conduct</b>	Knowledge Holdings & Investments Pte. Ltd., promoter group entity, a designated person, inadvertently traded in the equity shares of the Company without obtaining pre-clearance from the Company
5.	<b>Action taken by Listed company/ Intermediary/ Fiduciary</b>	"Knowledge Holdings and Investments Pte. Ltd." has been informed vide email dated March 5, 2024 that the matter will be placed before the next Audit and Board meeting of the Company and they may be penalised for the violation.
6.	<b>Reasons recorded in writing for taking action stated above</b>	<b>That it was an inadvertent mistake and the default party take full cognizance of the mistake and has assured that it will not happen again.</b>
7.	<b>Details of the previous instances of violations, if any, since last financial year</b>	None
8.	<b>If any amount collected for Code of Conduct violation(s)</b>  i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)  ii. Details of transfer/payment in case of online: Name of the transferor Bank Name, branch and Account number UTR/Transaction reference Number Transaction date Transaction Amount (in Rs.)  iii. In case of Demand Draft (DD): Bank Name and branch DD Number DD date DD amount (in Rs.)	Nil
9.	<b>Any other relevant information</b>	NA

Thanking You,  
For Precision Electronics Limited

  
Veenita Khurana  
Company Secretary &  
Compliance Officer  
PAN: AWTPP3744P  
Email id: [cs@pel-india.in](mailto:cs@pel-india.in)

Date: 04.04.24  
Place: Noida

# KNOWLEDGE HOLDINGS & INVESTMENTS PTE LIMITED

(Co. Regn. No.200312485N)

Regd. Office: 10, JALAN BESAR, 10-12, SIM LIM TOWER, SINGAPORE-208787

Email : [knowledgeholdingssg@gmail.com](mailto:knowledgeholdingssg@gmail.com)

## FORM C

**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]**

**Name of the Company:** Precision Electronics Limited

**ISIN of the Company:** INE143C01024

**Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/ DIN & address with contact nos.	Category of Person (Promoter/ KMP/ Directors/ immediate relative to/ others etc)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition-of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition/ disposal (on market/ public/ rights/ preferential offer/ off market/ inter-se transfer, ESOPs etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures, etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures, etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge/ Revoke/ Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures, etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14
<b>Name:</b> Knowledge Holdings & Investments Pte. Ltd. <b>PAN:</b> AAECK5509 P <b>Address:</b> 10 Jalan Besar, 10-12, SIM LIM Tower		Equity shares	3179905 Equity Shares comprising of 22.96% of Equity Shares	Equity shares	20,000 Equity Shares	12,99,800/-	Sale	Equity shares	3159905 Equity Shares comprising of 22.82% of Equity Shares	30 <sup>th</sup> Jan 2024	30 <sup>th</sup> Jan 2024	21/03/2024	Stock Exchange (ON Market)

Contact nos.:	Singapore-208787												
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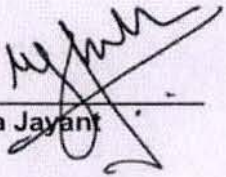
Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed Company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of Units (Contracts* lot size)	Notional Value	Number of Units (Contracts* lot size)	
15	16	17	18	19	20	21
Not applicable ("NA")	NA	NA	NA	NA	NA	NA

Note: In case of options, notional value shall be calculated based on premium plus strike price of options.

For Knowledge Holdings & Investments Pte. Ltd

  
Kuber Mrugendra Jayant  
Director

Date: 21.03.2024