



CHIEF GENERAL MANAGER &  
ADJUDICATING OFFICER

EAD-6/JR/AK/OW/ 4957/5/2025

February 13, 2025

**By SPAD / Digitally Signed E-mail**

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| Noticee 1 | <p><b>Manish Mishra, PAN: (AMPPM6823L),</b><br/> <b>Address 1:</b> 4-A New Arya Nagar, Jail Road Meerut, Ahmedabad, Gujarat 250003<br/> <b>Address 2:</b> Flat No P-807, Super Tech Icon Nyay Khand, Ndirapuram Ghaziabad, Uttar Pradesh India 201010<br/> <b>Address 3:</b> 201, Rudra Plus, Opp Girish Cold Drink, C G Road, Ahmedabad.<br/> <b>EMAIL:</b> <a href="mailto:profityatramishra@gmail.com">profityatramishra@gmail.com</a>; <a href="mailto:manish001983@gmail.com">manish001983@gmail.com</a>;<br/> <a href="mailto:aayatimishra@gmail.com">aayatimishra@gmail.com</a>; <a href="mailto:maanishmishra@gmail.com">maanishmishra@gmail.com</a>;<br/> <a href="mailto:manishshivmishra@gmail.com">manishshivmishra@gmail.com</a></p> |
| Noticee 2 | <p><b>Vrindaa Advanced Materials Ltd. PAN: (AAECP4144R)</b><br/> <b>Office No.604, GD-ITI North, Ex Tower, Plot No. A-09, Netaji Subhash Place, Pitampura, Delhi 110034</b><br/> <b>EMAIL:</b> <a href="mailto:pridebuildtechprivatelimited@gmail.com">pridebuildtechprivatelimited@gmail.com</a>;<br/> <a href="mailto:vrindaaadvanced@gmail.com">vrindaaadvanced@gmail.com</a></p>                                                                                                                                                                                                                                                                                                                                                              |
| Noticee 3 | <p><b>Vikas Lifecare Ltd. PAN: (AADCA5571A)</b><br/> <b>G-1 34/1 East Punjabi Bagh New Delhi 110026</b><br/> <b>EMAIL:</b> <a href="mailto:moonlitetechnochempvtltd@gmail.com">moonlitetechnochempvtltd@gmail.com</a>;<br/> <a href="mailto:info@vikaslifecarelimited.com">info@vikaslifecarelimited.com</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Noticee 4 | <p><b>Rajan Gupta PAN: (AEEPG8794H)</b><br/> <b>Address 1:</b> Flat No. 35, Pkt B - 8, Sector - 4, Rohini, Delhi India 110085.<br/> <b>Address 2:</b> 36/ B 8, Sec- 4 Rohini New Delhi, 110085<br/> <b>EMAIL:</b> <a href="mailto:NPSE97@REDIFFMAIL.COM">NPSE97@REDIFFMAIL.COM</a>; <a href="mailto:rajanpcb1@indiamails.org">rajanpcb1@indiamails.org</a>;<br/> <a href="mailto:npse97@rediffmail.com">npse97@rediffmail.com</a>; <a href="mailto:RG@PRRSAAR.COM">RG@PRRSAAR.COM</a>; <a href="mailto:rg@prrsaar.com">rg@prrsaar.com</a>;</p>                                                                                                                                                                                                    |
| Noticee 5 | <p><b>Namita Garg PAN: (AAOPJ0181H)</b><br/> <b>Address 1 :</b> House No-7, Road No -41, West Punjabi Bagh New Delhi 110026<br/> <b>Address 2:</b> 7/41, West Punjabi Bagh, Delhi 110026<br/> <b>Address 3:</b> House No. 38, Road No. 52, West Punjabi Bagh, New Delhi 110026<br/> <b>EMAIL:</b> <a href="mailto:vivek261974@gmail.com">vivek261974@gmail.com</a>; <a href="mailto:SUKUINNOVATIVES@GMAIL.COM">SUKUINNOVATIVES@GMAIL.COM</a>;<br/> <a href="mailto:gargvinayak15@gmail.com">gargvinayak15@gmail.com</a>;</p>                                                                                                                                                                                                                      |
| Noticee 6 | <p><b>Vinayak Garg PAN: (AQQPG5523N)</b><br/> <b>Address 1 :</b> House No-7, Road No -41 West Punjabi Bagh New Delhi 110026<br/> <b>Address 2:</b> House No-7 Plot No-41 West Punjabi Bagh, Delhi 110026<br/> <b>Address 3:</b> House No. 38, Road No. 52, West Punjabi Bagh, New Delhi 110026<br/> <b>EMAIL:</b> <a href="mailto:vivek261974@gmail.com">vivek261974@gmail.com</a>; <a href="mailto:gargvinayak15@gmail.com">gargvinayak15@gmail.com</a>;<br/> <a href="mailto:GARGVINAYAK15@GMAIL.COM">GARGVINAYAK15@GMAIL.COM</a>;</p>                                                                                                                                                                                                          |
| Noticee 7 | <p><b>Advik Capital Ltd. PAN: (AAACQ0004H)</b><br/> <b>Address 1 :</b> Plot No. 84, Khasra No. 143, 84 Ground Floor, Extended Lal Dora Kanjhawala, Near DTC Bus Depot New Delhi 110081<br/> <b>Address 2:</b> G-3 Vikas House, 34/1 East Punjabi Bagh Sec-III Delhi 110026<br/> <b>EMAIL:</b> <a href="mailto:AGARWAL1961@YAHOO.COM">AGARWAL1961@YAHOO.COM</a>; <a href="mailto:csadvik2021@gmail.com">csadvik2021@gmail.com</a>;</p>                                                                                                                                                                                                                                                                                                             |

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| Noticee 8  | <p><b>Blue Square Corporate Services Ltd. PAN: (AADCB4038M)</b><br/> <b>Address 1:</b> 103, 10<sup>th</sup> Floor, Yugdharma, Link Road, Goregaon West, Mumbai 400062<br/> <b>Address 2 :</b> 807 Express Zone, W. Express Highway, B. Wing, Malad-East, Mumbai 400062<br/> <b>EMAIL:</b> <a href="mailto:sharadrathi@hotmail.com">sharadrathi@hotmail.com</a>; <a href="mailto:sharad.rathi@almondz.com">sharad.rathi@almondz.com</a>;<br/> <a href="mailto:SHARADRATHI@YAHOO.COM">SHARADRATHI@YAHOO.COM</a>;</p>                                     |
| Noticee 9  | <p><b>Just Right Life Ltd. PAN: (AAWCS8320E)</b><br/> F-4, 34/1 Vikas House, Jaidev Park, East Punjabi Bagh, Delhi 110026<br/> <b>EMAIL:</b> <a href="mailto:steppingstoneprivatelimited@gmail.com">steppingstoneprivatelimited@gmail.com</a>;</p>                                                                                                                                                                                                                                                                                                     |
| Noticee 10 | <p><b>Naresh Aggarwal PAN: (ABJPK5857F)</b><br/> House No-33, Road No-72, West Punjabi Bagh, Delhi 110026<br/> <b>EMAIL:</b> <a href="mailto:NARESHAGGARWAL@UNITYGROUP.IN">NARESHAGGARWAL@UNITYGROUP.IN</a>; <a href="mailto:SGSUSHIL@GMAIL.COM">SGSUSHIL@GMAIL.COM</a>;</p>                                                                                                                                                                                                                                                                           |
| Noticee 11 | <p><b>Vijay Ghanshyambhai Pujara PAN: (AGXPP5209R)</b><br/> <b>ADDRESS 1:</b> 72/ 861, Karnavati Apartment, Sola Road, Naranpura, Ahmedabad 380063<br/> <b>ADDRESS 2:</b> Paras Nagar, 44/525, Sola Road, Naranpura, Ahmedabad 380063<br/> <b>EMAIL:</b> <a href="mailto:vijaypujara@rediffmail.com">vijaypujara@rediffmail.com</a>; <a href="mailto:vijaypujara007@gmail.com">vijaypujara007@gmail.com</a>;<br/> <a href="mailto:munnathakkar@yahoo.in">munnathakkar@yahoo.in</a>,</p>                                                                |
| Noticee 12 | <p><b>Shri Krishnan Kumar PAN: (AEWPK0416L)</b><br/> <b>ADDRESS 1:</b> 289, Deepali Enclave, Pitam Pura, Delhi 110034<br/> <b>ADDRESS 2:</b> House No 33, 3rd Floor, Road No. 72, West Punjabi Bagh, New Delhi 110034<br/> <b>EMAIL:</b> <a href="mailto:krishanaggarwal@unitygroup.in">krishanaggarwal@unitygroup.in</a>; <a href="mailto:sgsushil@gmail.com">sgsushil@gmail.com</a>;</p>                                                                                                                                                             |
| Noticee 13 | <p><b>Urvashi Mittal PAN: (ASKPB4999D)</b><br/> House No-138, Deepali Enclave, Pitampura, Delhi India 110034<br/> <b>EMAIL:</b> <a href="mailto:mohanaggarwal@unitygroup.in">mohanaggarwal@unitygroup.in</a></p>                                                                                                                                                                                                                                                                                                                                       |
| Noticee 14 | <p><b>Charu Sharad Rathi PAN: (ACYPR1415Q)</b><br/> 103-Yugdharma Bldg 10th Floor, Link Road, Goregaon (West), Mumbai 400062<br/> <b>EMAIL:</b> <a href="mailto:SHARADRATHI@YAHOO.COM">SHARADRATHI@YAHOO.COM</a></p>                                                                                                                                                                                                                                                                                                                                   |
| Noticee 15 | <p><b>Priya Mittal PAN: (AGBPM3239N)</b><br/> <b>Address 1:</b> 323, Tarun Enclave, Pitam Pura, New Delhi 110034<br/> <b>Address 2:</b> House No 289, Deepali Enclave, Pitampura, New Delhi, 110034<br/> <b>Address 3 :</b> W/O Naresh Mittal 289 Deepali Enclave Pitampura, Saraswati Vihar, Delhi 110034<br/> <b>EMAIL:</b> <a href="mailto:nmittal999@hotmail.com">nmittal999@hotmail.com</a>; <a href="mailto:NMITTAL999@GMAIL.COM">NMITTAL999@GMAIL.COM</a>;<br/> <a href="mailto:priya.mittal7476@gmail.com">priya.mittal7476@gmail.com</a>;</p> |

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| Noticee 16 | <p><b>Sharad Kumar Bagga PAN: (ABIPB2288G)</b><br/> <b>Address 1:</b> Shree Shankar Plastics Ltd., 6/9 Sanjay Mittal Estate Andheri-Kurla Rd, Andheri East, Mumbai 400059<br/> <b>Address 2:</b> 104, Sainik Vihar, North West Delhi, Pitam Pura, Delhi 110034<br/> <b>Email:</b> <a href="mailto:shreeshankarplastics@rediffmail.com">shreeshankarplastics@rediffmail.com</a>; <a href="mailto:shreeshankarplastics@yahoo.com">shreeshankarplastics@yahoo.com</a></p>                                                                                                                                                 |
| Noticee 17 | <p><b>SKSE Securities Ltd. Corp. CMTM Prop AC PAN: (AAFCS1539J)</b><br/> Saket Plaza 2nd Floor, 11, Panchnath Plot, Dr Rajendra Prasad Rd, Rajkot, Gujarat 360001<br/> <b>EMAIL:</b> <a href="mailto:compliance@sksesl.com">compliance@sksesl.com</a>;</p>                                                                                                                                                                                                                                                                                                                                                             |
| Noticee 18 | <p><b>Nirmal Aggarwal PAN: (AAZPA7513M)</b><br/> <b>Address 1:</b> W/O Ishwar Chand H.No-139, Deepali Enclave, Pitampura, Delhi 110034<br/> <b>Address 2:</b> House No 30, Road No 78, West Punjabi Bagh New Delhi 110026<br/> <b>Address 3:</b> 139, Deepali Enclave, Pitam Pura, Delhi 110034<br/> <b>EMAIL:</b> <a href="mailto:tarunaggarwal@unitygroup.in">tarunaggarwal@unitygroup.in</a>; <a href="mailto:ishwarchandmittal@unitygroup.in">ishwarchandmittal@unitygroup.in</a>; <a href="mailto:sgsushil@gmail.com">sgsushil@gmail.com</a></p>                                                                  |
| Noticee 19 | <p><b>Sonakshi Mittal PAN: (CGPPM9221A)</b><br/> C/O Pranav Bansal House No. F-7, Ashok Vihar, Phase-1 Delhi 110052<br/> <b>EMAIL:</b> <a href="mailto:sonakshi@bansalwire.com">sonakshi@bansalwire.com</a></p>                                                                                                                                                                                                                                                                                                                                                                                                        |
| Noticee 20 | <p><b>Sandeep Bansal PAN: (AAFPB3424Q)</b><br/> <b>Address 1:</b> House No.2, Road No.60, Punjabi Bagh West, Delhi 110026<br/> <b>Address 2:</b> A1, Manohar Market, Hauz Quazi, New Delhi,<br/> <b>Address 3:</b> H.No – 1252, Sector -6 Bahadurgarh, Haryana<br/> <b>EMAIL:</b> <a href="mailto:sandeep@swastikpipes.com">sandeep@swastikpipes.com</a>; <a href="mailto:SHIV.KUMAR@SWASTKKPIPES.COM">SHIV.KUMAR@SWASTKKPIPES.COM</a>;</p>                                                                                                                                                                            |
| Noticee 21 | <p><b>Govind Aggarwal PAN: (ABVPA5466G)</b><br/> <b>ADDRESS 1:</b> Hno-131 Deepali Enclave, Pitampura, Delhi 110034<br/> <b>Address 2:</b> House No. 30, Road No. 78 West Punjabi Bagh New Delhi 110026<br/> <b>EMAIL:</b> <a href="mailto:govindaggarwal@unitygroup.in">govindaggarwal@unitygroup.in</a></p>                                                                                                                                                                                                                                                                                                          |
| Noticee 22 | <p><b>Naresh Mittal PAN: (AFHPM9429D)</b><br/> <b>ADDRESS 1:</b> 323, Tarun Enclave, Pitam Pura New Delhi-110034<br/> <b>Address 2:</b> H.No.289, Deepali Enclave, Pitampura, Delhi 110034<br/> <b>EMAIL:</b> <a href="mailto:nmittal999@gmail.com">nmittal999@gmail.com</a></p>                                                                                                                                                                                                                                                                                                                                       |
| Noticee 23 | <p><b>Vikas Garg PAN: (AAPPG8241P)</b><br/> H No -10, Road No. – 4, East Punjabi Bagh Delhi 110026<br/> <b>EMAIL:</b> <a href="mailto:vikas.nkg@gmail.com">vikas.nkg@gmail.com</a>; <a href="mailto:vikas.garg@vikasecotech.com">vikas.garg@vikasecotech.com</a>; <a href="mailto:vikas.garg4466@gmail.com">vikas.garg4466@gmail.com</a>; <a href="mailto:vikas.garg@vikasecotech.com">vikas.garg@vikasecotech.com</a></p>                                                                                                                                                                                             |
| Noticee 24 | <p><b>Jayantilal Babulal Ranka PAN: (AABPR8238C)</b><br/> <b>Address 1:</b> 82, 8th Flr, Trimurti Tower, Jakariya Road, Nr. Liberty Garden Mamlatdarwadi, Mumbai 400064<br/> <b>Address 2:</b> C/O Babulal Ranka 130, Cavel Cross Lane, 1st Flr, Behind Swadeshi Mkt, Kalbadevi, Mumbai 400002<br/> <b>EMAIL:</b> <a href="mailto:ranka8283@gmail.com">ranka8283@gmail.com</a>; <a href="mailto:TANISHRANKA28@GMAIL.COM">TANISHRANKA28@GMAIL.COM</a>; <a href="mailto:online2012.co@gmail.com">online2012.co@gmail.com</a>; <a href="mailto:deepeshsynthetics@rediffmail.com">deepeshsynthetics@rediffmail.com</a></p> |

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| Noticee<br>25 | <p><b>Seema Garg PAN: (AAJPG3268R)</b><br/> <b>ADDRESS 1:</b> House No.10/4, Road No.4, East Panjabi Bagh New Delhi 110026<br/> <b>Address 2:</b> H.No.7, Road No.41, Punjabi Bagh, New Delhi 110026<br/> <b>EMAIL:</b> <a href="mailto:vikas.garg4466@gmail.com">vikas.garg4466@gmail.com</a>, <a href="mailto:vikas.nkg@gmail.com">vikas.nkg@gmail.com</a>;<br/> <a href="mailto:seema.grg1974@gmail.com">seema.grg1974@gmail.com</a>; <a href="mailto:seema.garg.vikas@gmail.com">seema.garg.vikas@gmail.com</a>;</p> |
| Noticee<br>26 | <p><b>Sharad Premprakash Rathi PAN: (AAFPR3291K)</b><br/> <b>ADDRESS 1:</b> Flat No 142, 14th Floor, Kalpataru Pinnacle CTS No 1200c, Mulund Link Road, Goregaon West, Goregaon Inorbit, Mumbai 400104<br/> <b>Address 2:</b> 103, Yugdhama Bldg, 10th Floor, Link Road, Goregaon W, Mumbai 400062<br/> <b>EMAIL:</b> <a href="mailto:sharadrathi@yahoo.com">sharadrathi@yahoo.com</a></p>                                                                                                                               |
| Noticee<br>27 | <p><b>Wessel Consultancy Pvt. Ltd. PAN: (AABCW7779E)</b><br/> <b>ADDRESS 1:</b> H.No. - 918 Village Badlitehsi, Badli Disstt Jhajjarh.No – 918 Jhajjar, Haryana 124105<br/> <b>Address 2:</b> Kh. No. 252, Front Portion, Ground Floor, Street No. 4, Shastri Park, Extn City Delhi ,110084<br/> <b>EMAIL:</b> <a href="mailto:WESSELCONSULTANCY5@GMAIL.COM">WESSELCONSULTANCY5@GMAIL.COM</a>;</p>                                                                                                                       |
| Noticee<br>28 | <p><b>Vishesh Gupta PAN: (AIAPG4936H)</b><br/> <b>ADDRESS 1:</b> S/O Uma Gupta F-14/9, Modeltown Part-Ii, Dr. Mukerjee Nagar Delhi 110009<br/> <b>Address 2:</b> House No. F 14, 9 Model Town Part II Dr Mukerjee Nagar New Delhi 110009<br/> <b>EMAIL:</b> <a href="mailto:guptavishesh9@gmail.com">guptavishesh9@gmail.com</a>,</p>                                                                                                                                                                                    |
| Noticee<br>29 | <p><b>Shyam HUF PAN: (ABAH57715R)</b><br/> B- 603, Balaji Apartment Sector 14, Delhi 110085<br/> <b>EMAIL:</b> <a href="mailto:sssaraogi7@gmail.com">sssaraogi7@gmail.com</a>; <a href="mailto:AMITXXIX@GMAIL.COM">AMITXXIX@GMAIL.COM</a>;<br/> <a href="mailto:SSSARAOGI@GMAIL.COM">SSSARAOGI@GMAIL.COM</a></p>                                                                                                                                                                                                         |
| Noticee<br>30 | <p><b>Dipak Dwivedi PAN: (ATDPD4055C)</b><br/> <b>ADDRESS 1:</b> C /O Madhusudan Dwiwedi Chilva Tal, 131 –A, Millennium City, Ph 2, Gorakhpur, Uttar Pradesh 273001<br/> <b>Address 2:</b> 131/A Millennium City Ph-2, Chilva Tal, Gorakhpur Uttar Pradesh 273001<br/> <b>EMAIL:</b> <a href="mailto:dpkdwivedi90@gmail.com">dpkdwivedi90@gmail.com</a></p>                                                                                                                                                              |
| Noticee<br>31 | <p><b>Angad Ishwarlal Rathod PAN: (CIUPR1814B)</b><br/> 94, Samirnagar, Maheshwari Nagar Part-2, Sunflower English School Road, Odhav, Ahmedabad 382415<br/> <b>EMAIL:</b> <a href="mailto:rathodangad19@gmail.com">rathodangad19@gmail.com</a></p>                                                                                                                                                                                                                                                                      |

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| Noticee 32 | <p><b>Sunil Bhandari PAN: (ALZPB5747M)</b><br/> <b>ADDRESS 1:</b> B-201, Wembley Estate, Opp Rosewood City, Sector 49-50, Sonha Road, Gurgaon 122001<br/> <b>ADDRESS 2:</b> B-301, Wembley Estate, Opp Rosewood City, Sector 49-50, Sonha Road, Gurgaon 122001<br/> <b>ADDRESS 3:</b> 3/286, Vipul Khandgomti Nagar Lucknow 226010<br/> <b>ADDRESS 4:</b> H. No. 269, Usha Nagar, Indore 452001<br/> <b>ADDRESS 5:</b> A-204, Wembley Estate, Rose Wood City, Sector 49, Near South City, Gurgaon 122001<br/> <b>EMAIL:</b> <a href="mailto:SBHANDARI.INDORE@GMAIL.COM">SBHANDARI.INDORE@GMAIL.COM</a>;<br/> <a href="mailto:SUNIL_LUCKNOW@REDIFFMAIL.COM">SUNIL_LUCKNOW@REDIFFMAIL.COM</a>;<br/> <a href="mailto:SUNIL_LUCKNOW@SIFY.COM">SUNIL_LUCKNOW@SIFY.COM</a>;<br/> <a href="mailto:SUNILCHGF137@INDIAMAILS.ORG">SUNILCHGF137@INDIAMAILS.ORG</a>;<br/> <a href="mailto:SUNIL02136@INDIA.COM">SUNIL02136@INDIA.COM</a>;</p> |
| Noticee 33 | <p><b>Rekha Bhandari PAN: (ALHPB9175D)</b><br/> <b>ADDRESS 1:</b> B-201, Wembley Estate, Opp Rosewood City, Sector 49-50, Sonha Road, Gurgaon 122001<br/> <b>ADDRESS 2:</b> B-301, Wembley Estate, Opp Rosewood City, Sector 49-50, Sonha Road, Gurgaon 122001<br/> <b>ADDRESS 3:</b> 3/286, Vipul Khandgomti Nagar Lucknow 226010<br/> <b>ADDRESS 4:</b> H. No. 269, Usha Nagar, Indore 452001<br/> <b>ADDRESS 5:</b> A-204, Wembley Estate, Rose Wood City, Sector 49, Near South City, Gurgaon 122001<br/> <b>EMAIL:</b> <a href="mailto:RBHANDARI.INDORE@GMAIL.COM">RBHANDARI.INDORE@GMAIL.COM</a>;<br/> <a href="mailto:REKHA_9660@SIFY.COM">REKHA_9660@SIFY.COM</a>;<br/> <a href="mailto:REKHACHGF138@INDIAMAILS.ORG">REKHACHGF138@INDIAMAILS.ORG</a>;<br/> <a href="mailto:01AG5084@VENTURA1.COM">01AG5084@VENTURA1.COM</a>;</p>                                                                                          |
| Noticee 34 | <p><b>Swati Agarwal PAN: (AHSPA6945R)</b><br/> W/O: Amit Singh 146, Azampur, Mulsam Bagpat Uttar Pradesh 250622<br/> <b>EMAIL:</b> <a href="mailto:DRSWATIAGARWALSVU@GMAIL.COM">DRSWATIAGARWALSVU@GMAIL.COM</a>;</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Noticee 35 | <p><b>Vertika Singh PAN: (IYAPS6653F)</b><br/> C/O Shri Sanjay Singh, 129- 131, North Avenue Presidential State, Rashtrapati Bhawan, GPO New Delhi 110001<br/> <b>EMAIL:</b> <a href="mailto:singhvartika017@gmail.com">singhvartika017@gmail.com</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Noticee 36 | <p><b>Meera Chopra PAN: (AGNPC4393B)</b><br/> D/6-501/502, 5th Floor, Krishna Kevari Society, Yamuna Ngr, Oshiwara Andheri West, Azad Nagar Mumbai 400053<br/> <b>EMAIL:</b> <a href="mailto:mirachopra@gmail.com">mirachopra@gmail.com</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Noticee 37 | <p><b>Abhinendra Singh PAN: (BSUPS4998G)</b><br/> <b>Address 1:</b> S/ O N S Baghel D- 712, Prabha Apartment Plot No. 11, Delhi 110077<br/> <b>Address 2:</b> D 712 Prabha Apartment Plot No. 11, Sector 23, Dwarka, Delhi 110077<br/> <b>EMAIL:</b> <a href="mailto:abhinendra.singh@gmail.com">abhinendra.singh@gmail.com</a>;</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Noticee 38 | <p><b>Aahuti Rasik Mistri PAN: (AKSPM8453F)</b><br/> <b>Address 1:</b> 301, Silver Chariot Old Lokhandwala Complex, Behind Ashok Academy School Andheri West, Mumbai Maharashtra 400053<br/> <b>Address 2:</b> D/ O Rasik Mistry 301 Silver Chariot Old Lokhandwala Complex Andheri West Behind Ashok Academy School Mumbai 400053<br/> <b>EMAIL:</b> <a href="mailto:aahutimistry@gmail.com">aahutimistry@gmail.com</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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| Noticee 39 | <b>Karavan Tradelink OPC Private Ltd. PAN: (AAGCK2880F)</b><br>8 G F, Goyal Terrace Bodakdev, Nr Judges Bungalows, Satellite, Ahmedabad 380015<br>EMAIL: <a href="mailto:karavantradelink@gmail.com">karavantradelink@gmail.com</a>                                                                                                                                                                                                                                                                                                                                                                     |
| Noticee 40 | <b>Jatin Manubhai Shah PAN: (AEGPS5807M)</b><br><b>Address1:</b> 305, Abhigam Complex, Opp Doctor House Near Parimal Crossing Ahmedabad<br><b>Address 2:</b> 1208, Vachto T Kancu, Khadia Ahmedabad<br><b>Address 3:</b> A-4, Shashwat Appartment, Hirabag, Ambawadi, Ellis Bridge, Ahmedabad 380006<br><b>Email:</b> <a href="mailto:span_tradelink@rediffmail.com">span_tradelink@rediffmail.com</a> ; <a href="mailto:jems.bond74@yahoo.com">jems.bond74@yahoo.com</a> ; <a href="mailto:workandwork1512@yahoo.com">workandwork1512@yahoo.com</a> ;                                                  |
| Noticee 41 | <b>Kishansinh Mansinh Rajput PAN: (BSFPR0253J)</b><br>2, Tejaji Kaluji Ni Chali, Chamanpura, Asarwa Ahmedabad Gujarat India 380016<br>EMAIL: <a href="mailto:krisharajput449@gmail.com">krisharajput449@gmail.com</a>                                                                                                                                                                                                                                                                                                                                                                                   |
| Noticee 42 | <b>Apoorva Agarwal PAN: (AMUPA5282G)</b><br>72, Kailash Niwas Ramganj Railway Road, Hapur, Uttar Pradesh 245101<br>EMAIL: <a href="mailto:apoorva_star88@yahoo.co.in">apoorva_star88@yahoo.co.in</a>                                                                                                                                                                                                                                                                                                                                                                                                    |
| Noticee 43 | <b>Anshu Mishra PAN: (BMIPS3480H)</b><br><b>Address1:</b> 4/ A, New Arya Nagar Jail Chungi Victoria Park, Meerut 250001<br><b>Address2:</b> F 106, Kuber Residency Science City, Bhadaj Circle, Near Science City, Bhadaj Vill Bhadaj Ahmedabad 380060<br><b>EMAIL:</b> <a href="mailto:manishmishraahmedabad@gmail.com">manishmishraahmedabad@gmail.com</a> ; <a href="mailto:anishumishramanish@gmail.com">anishumishramanish@gmail.com</a> ; <a href="mailto:anshu.mishra@korbeauty.com">anshu.mishra@korbeauty.com</a> ; <a href="mailto:adhwitamishra@hotmail.com">adhwitamishra@hotmail.com</a> ; |

**Notice under Rule 4(1) of SEBI (Procedure for Holding Inquiry and imposing penalties) Rules, 1995 read with Section 15-I of Securities and Exchange Board of India Act, 1992 in the matter of G G Engineering Limited**

1. Securities and Exchange Board of India (hereinafter referred to as 'SEBI') carried out an investigation in the scrip of GG Engineering Ltd. (hereinafter referred to as "GGENG") and found that the Noticees have allegedly violated various provisions of SEBI Act and SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 (hereinafter referred to as "PFUTP Regulations").
2. Upon being satisfied that the said Noticees have *prima facie* violated various provisions of SEBI Act and PFUTP Regulations, SEBI initiated adjudication proceedings u/s 19 of the SEBI Act, 1992 ("SEBI Act") r/w Sub-section (1) of Section 15 I of the SEBI Act and Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 (hereinafter referred to as the "SEBI Adjudicating Rules") and appointed the undersigned as Adjudicating Officer, vide

Order dated January 24, 2025 (copy of the Order communicating the appointment is enclosed as **Annexure 1**), to enquire into and adjudge under section 15HA of the SEBI Act for the alleged violations of section 12A(a), (b),(c) of the SEBI Act r/w regulation 3(a), (b), (c), (d), 4(1), 4(2)(a), (k) and (r) of the PFUTP Regulations by the Noticees.

### **Findings of the Investigation**

3. The Investigation Period was September 19, 2022 to December 31, 2022 (hereinafter referred to as "IP") which was divided into three patches. **Patch 1**(Pre Video Patch): September 19, 2022 to December 4, 2022, **Patch 2** (Video Patch): December 5, 2022 to December 12, 2022, **Patch 3** (Post video Patch): December 13, 2022 to December 31, 2022.
4. From the analysis of the Unique Client Code (UCC) details, Call Data Records (CDRs), bank statements, directorship / shareholder details etc., 43 suspected entities were identified. Some of the suspects also include more than 1% shareholders who had subscribed in the rights issue of GGENG in August – September 2022. Based on connections, 2 groups were identified – Net Sellers Group and Manish Mishra Group. 2 entities from Manish Mishra Group were also the net sellers. Sunil Bhandari is seen as the main conduit between Net Sellers Group and Manish Mishra Group.
5. It was observed that Shri Manish Mishra uploaded / circulated the YouTube videos related to false and misleading information about GGENG with a buy recommendation in this scrip. The total traded volume during Patch 1 was 7,25,38,147 in 52 trading days whereas after the video upload, the volumes rose substantially and was 16,84,93,511 in only 6 trading days. This increase in volumes is allegedly due to the impact of videos and trading pattern of suspected entities that generated interest in the scrip of GGENG and gullible investors fell prey to the entire scheme. In Patch 1, 12 out of 43 suspected entities are observed to be trading in the scrip of GGENG wherein as buyer, they have cumulatively contributed 18.16% to traded volume and as seller, 12.5% to traded volume. 4 entities have net sold and 8 entities have net bought the shares of GGENG during Patch 1.
6. In Patch 2, out of the 43 entities, 27 entities net sold, 3 entities squared off and 13 entities net bought the shares of GGENG. As buyer, suspected entities contributed 29.5% to total traded volume and as seller, suspected entities contributed 53.2% to sell volume. Suspected entities contributed 10.09% to market volume by trading among themselves. Out of the 25 top net sellers in Patch 2, 24 entities are part of suspected entities' list. These 24 suspected entities sold 4,77,85,761 shares during Patch 2. Out of these 24 entities, 19 entities were allotted shares in the rights issue of GGENG. Hence, there is allegedly a pattern of shares being sold by the connected / related entities post the circulation of false and misleading information about the scrip of GGENG through YouTube videos. 13 entities which are connected to Manish Mishra Group have altogether bought 86,50,965 shares on

net basis. Hence, it is alleged that the videos played a great role in enticing gullible investors which helped Net Sellers Group offload their shares in Patch 2. Manish Mishra Group entities also exited the scrip of GGENG by January 31, 2023. Thus, videos helped generate liquidity in a low liquid scrip of GGENG. It is also observed that 25 suspected entities out of 43, have entered into order spoofing in Patch 2 wherein buy and / or sell orders placed by them were subsequently deleted / cancelled. This led to creation of misleading appearance of trading in the market.

7. Out of 26 suspected entities which belong to Net Sellers Group, 25 entities sold the shares on net basis and 1 entity squared off its position during Patch 2. On counter party analysis of the volume of shares sold by the aforesaid Net Sellers Group entities to Manish Mishra Group entities, it is observed that Manish Mishra Group entities cumulatively purchased 1,05,29,131 quantity of shares from Net Sellers Group which is 16.62% of the volume sold by the net sellers and 6.25 % of market volume in Patch 2. While on analysis of trades amongst Manish Mishra Group entities, it is observed that trading amongst themselves was only 1.54% of market volume in Patch 2. This indicates the intention of Manish Mishra Group to provide the exit to Net Sellers Group.
8. In Patch 3, only 11 suspected entities out of 43 suspected entities traded in the scrip of GGENG. 1 suspected entity traded as a net buyer, 1 suspected entity squared off the trades and remaining 9 entities traded as net sellers. Suspected entities contributed 18.54% to buy volume and 26.05% to sell volume.
9. The shareholding pattern of GGENG for various quarters covering investigation period is as under:

| Particular              | June - 2022        |                          |                     | September - 2022   |                          |                     | December - 2022    |                          |                     |
|-------------------------|--------------------|--------------------------|---------------------|--------------------|--------------------------|---------------------|--------------------|--------------------------|---------------------|
| Category of shareholder | No. of shares held | % to total no. of shares | No. of share holder | No. of shares held | % to total no. of shares | No. of share holder | No. of shares held | % to total no. of shares | No. of share holder |
| Promoters (a)           | 19,34,990          | 1.88                     | 3                   | 75,34,990          | 1.98                     | 3                   | 75,34,990          | 1.98                     | 3                   |
| Public Shareholding (b) | 10,11,65,460       | 98.12                    | 32,612              | 37,31,43,595       | 98.02                    | 34,310              | 37,31,43,595       | 98.02                    | 43,186              |
| Total (a + b)           | 10,31,00,450       | 100                      | 32,615              | 38,06,78,585       | 100                      | 34,313              | 38,06,78,585       | 100                      | 43,189              |

10. The details of the promoters for above quarters is placed below:

| Sr. No.             | Name                          | June - 2022   |                   | September - 2022 |                   | December - 2022 |                   |
|---------------------|-------------------------------|---------------|-------------------|------------------|-------------------|-----------------|-------------------|
|                     |                               | No. of Shares | % to total Shares | No. of Shares    | % to total Shares | No. of Shares   | % to total Shares |
| 1                   | Shri Vinod Harmukhrai Beriwal | 2,00,000      | 0.19              | 2,00,000         | 0.05              | 2,00,000        | 0.05              |
| 2                   | Ms. Kamal Beriwal             | 17,33,330     | 1.68              | 73,33,330        | 1.93              | 73,33,330       | 1.93              |
| 3                   | Ms. Shashi Devi Beriwal       | 1,660         | 0.00              | 1,660            | 0.00              | 1,660           | 0.00              |
| Total               |                               | 19,34,990     | 1.87              | 75,34,990        | 1.98              | 75,34,990       | 1.98              |
| No. Of Shareholders |                               | 3             |                   | 3                |                   | 3               |                   |

**11. List of Shareholders holding more than 1%**

| Sr. No                     | Name                                   | June - 2022   |                         | September - 2022    |                         | December - 2022    |                         |
|----------------------------|----------------------------------------|---------------|-------------------------|---------------------|-------------------------|--------------------|-------------------------|
|                            |                                        | No. of Shares | % to total no of Shares | No. of Shares       | % to total no of Shares | No. of Shares      | % to total no of Shares |
| 1                          | Shri Vinayak Garg                      | -             | -                       | 39,00,000           | 1.02                    | -                  | -                       |
| 2                          | Shri Bhushan Aggarwal                  | -             | -                       | 45,40,000           | 1.19                    | 45,40,000          | 1.19                    |
| 3                          | Shri Naveen Kurele                     | -             | -                       | 1,30,00,000         | 3.41                    | 1,30,00,000        | 3.41                    |
| 4                          | Shri Praveen Kurele                    | -             | -                       | 2,00,00,000         | 5.25                    | 2,00,00,000        | 5.25                    |
| 5                          | Ms. Namita Garg                        | -             | -                       | 39,00,000           | 1.02                    | -                  | -                       |
| 6                          | M/s Vrindaa Advanced Materials Limited | -             | -                       | 2,75,57,742         | 7.24                    | 1,96,13,170        | 5.15                    |
| 7                          | M/s Vikas Lifecare Limited             | -             | -                       | 1,65,00,002         | 4.33                    | 1,10,11,107        | 2.89                    |
| 8                          | M/s Advik Capital Limited              | -             | -                       | 1,14,00,049         | 2.99                    | 1,15,59,606        | 3.04                    |
| <b>Total</b>               |                                        | <b>0</b>      | <b>0.00</b>             | <b>10,07,97,793</b> | <b>26.45</b>            | <b>7,97,23,883</b> | <b>20.93</b>            |
| <b>No. of Shareholders</b> |                                        | <b>0</b>      |                         | <b>8</b>            |                         | <b>6</b>           |                         |

**12. Observations on Shareholding Pattern**

- Total number of the shares of the company increased from 10,31,00,450 shares as per quarter ended June 2022 to 38,06,78,585 shares as per quarter ended September 2022 on account of allotment of 27,75,78,135 fully paid-up Rights Equity shares of face value of Re. 1/- each at a price of Rs. 1.80/- per Rights Equity share including premium of Rs. 0.80/- per Rights Equity share
- As per shareholding pattern for quarter ended December 2022, the total shares of the company were 38,06,78,585 shares out of which 75,34,990 shares (1.98% of the total shares) were held by 3 promoters and 37,31,43,595 (98.02% of the total shares) were held by 43,186 public entities.
- The total number of shareholders under non-promoter category increased from 32,612 during quarter ended June 2022 to 34,310 in September 2022 and to 43,186 during quarter ended December 2022.
- Further, for shareholders holding more than 1% shares as on quarter ended September 2022 when compared with December 2022, the following observations are made
  - shareholders viz. Shri Vinayak Garg and Ms. Namita Garg have nil holdings as on December 31, 2022.
  - Holdings of Vrindaa Advanced Materials Limited and Vikas Lifecare Limited has decreased in the quarter ended December 2022.
  - Holding of M/s Advik Capital Ltd. has increased by 0.05% whereas for other 1% shareholders it remained the same.

13. It is observed that GGENG came out with a rights issue of less than Rs. 50 Crores (Rupees Fifty Crores) for issuance of upto 27,75,78,135 fully paid-up equity shares of face value of Re. 1/- each for an amount aggregating upto 4996.41 Lakhs. The issue price was Rs.1.80/- per rights equity share (including premium of Re. 0.80/- per rights equity share). Further, details of the rights issue like corporate

announcements, allotment details are placed at **Annexure 2**. The total number of shares allotted in rights issue are 27,75,78,135 at a price of Rs. 1.8/- per rights equity share. The shares were listed on September 19, 2022.

14. It is observed that the video was circulated on December 4, 2022 (i.e. on Sunday) and deleted on Sep 26, 2023. GGENG came out with the rights issue in August 2022 and the rights equity shares were listed on September 19, 2022. It is also observed that the price in the scrip of GGENG apparently fell slightly (from Rs. 3.08/- on September 19, 2022 to Rs. 1.78/- on October 11, 2022 and thereafter, entered a stable patch and the price was maintained around Rs.1.75/-). Also, the scrip of GGENG was trading around Rs. 1.77/- as on December 2, 2022 just before the video upload. After the video upload, the volumes had jumped many folds and the price movement was not significant as also seen from the graph below.

15. The price volume data during IP is enclosed as **Annexure 3**. The broad details on price volume data of the scrip on BSE for the IP is given below:

| Period                                                | Details | Dates      | Opening Price(Rs.) | Closing Price(Rs.) | Low Price(Rs.) | High Price(Rs.) | Volume      | Avg. Volume    |
|-------------------------------------------------------|---------|------------|--------------------|--------------------|----------------|-----------------|-------------|----------------|
| <b>Pre-Video-Patch-1:</b> 19-09-2022 to 04-12-2022    | Open    | 19-09-2022 | 3.08               | 3.08               | 3.08           | 3.08            | 1,80,248    | 13,94,964.37   |
|                                                       | Close   | 02-12-2022 | 1.7                | 1.77               | 1.68           | 1.78            | 11,83,014   |                |
|                                                       | Low     | 24-11-2022 | 1.7                | 1.75               | 1.64           | 1.75            | 7,33,924    |                |
|                                                       | High    | 19-09-2022 | 3.08               | 3.08               | 3.08           | 3.08            | 1,80,248    |                |
| <b>Video Patch-2:</b> 05-12-2022 to 12-12-2022        | Open    | 05-12-2022 | 1.85               | 1.85               | 1.83           | 1.85            | 2,76,26,958 | 2,80,82,251.83 |
|                                                       | Close   | 12-12-2022 | 1.75               | 1.75               | 1.75           | 1.75            | 54,71,539   |                |
|                                                       | Low     | 12-12-2022 | 1.75               | 1.75               | 1.75           | 1.75            | 54,71,539   |                |
|                                                       | High    | 07-12-2022 | 1.99               | 1.84               | 1.84           | 2.01            | 8,40,84,798 |                |
| <b>Post-Video - Patch-3:</b> 13-12-2022 to 31-12-2022 | Open    | 13-12-2022 | 1.67               | 1.67               | 1.67           | 1.74            | 39,36,330   | 14,84,054.29   |
|                                                       | Close   | 30-12-2022 | 1.35               | 1.35               | 1.35           | 1.35            | 2,78,664    |                |
|                                                       | Low     | 30-12-2022 | 1.35               | 1.35               | 1.35           | 1.35            | 2,78,664    |                |
|                                                       | High    | 13-12-2022 | 1.67               | 1.67               | 1.67           | 1.74            | 39,36,330   |                |
| <b>IP</b> 19-09-2022 to 31-12-2022                    | Open    | 19-09-2022 | 3.08               | 3.08               | 3.08           | 3.08            | 1,80,248    | 36,36,228.03   |
|                                                       | Close   | 30-12-2022 | 1.35               | 1.35               | 1.35           | 1.35            | 2,78,664    |                |
|                                                       | Low     | 30-12-2022 | 1.35               | 1.35               | 1.35           | 1.35            | 2,78,664    |                |
|                                                       | High    | 19-09-2022 | 3.08               | 3.08               | 3.08           | 3.08            | 1,80,248    |                |

#### 16. Observation on Price-Volume Movement during IP:

- During the entire period (September 19, 2022 to Dec 31, 2022), price of the scrip opened at Rs. 3.08/- on September 19, 2022 and closed at Rs.1.35/- on December 30, 2022 with average daily volume of 36,36,228.03 shares and total trading volume of 26,18,08,418 shares.
- During the pre-video patch (September 19, 2022 to December 4, 2022), price of the scrip opened at Rs. 3.08/- on September 19, 2022 and closed at Rs. 1.77/- on December 2, 2022 (December 3 and 4 being weekend days) with average daily volume of 13,94,964.37 shares and total traded volume of 7,25,38,147 shares.
- During the video patch (December 5, 2022 to December 12, 2022), price of the scrip opened at Rs. 1.85/- on December 5, 2022 and closed at Rs. 1.75/- on

December 12, 2022 with average daily volume of 2,80,82,251.83 shares and total traded volume of 16,84,93,511 shares.

- During the post video period (December 13, 2022 to December 31, 2022), price of the scrip opened at Rs. 1.67/- on December 13, 2022 and closed at Rs. 1.35/- on December 30, 2022 (December 31, 2022 being Saturday) with an average daily volume of 14,84,054.29 shares and total traded volume of 2,07,76,760 shares.
- In brief, the impact of volumes pursuant to videos that were uploaded is demonstrated below:

| Period                  | Volume       | No. of Trades | No. of Trading Days | Average Volume | Average No. of Trades |
|-------------------------|--------------|---------------|---------------------|----------------|-----------------------|
| 19.09.2022 - 04.12.2022 | 7,25,38,147  | 28,661        | 52                  | 13,94,964      | 551.17                |
| 25.11.2022 - 02.12.2022 | 41,07,882    | 2,766         | 6*                  | 6,84,647       | 461                   |
| 05.12.2022 - 12.12.2022 | 16,84,93,511 | 25,839        | 6                   | 2,80,82,251    | 4,306.5               |
| 13.12.2022 - 31.12.2022 | 2,07,76,760  | 8,082         | 14                  | 14,84,054      | 577.28                |

\*(taken 6 days prior to video upload to compare it with next 6 trading days after video upload)

17. BSE had shared two videos uploaded on YouTube on December 4, 2022. The two videos as shared by BSE are provided at **Annexure 4**.

18. The following are observed from the two videos provided by BSE:

- 18.1 The share price of GGENG would rise from current market price of Rs. 1.77/- to Rs. 20/- within 3 months and Rs. 100/- in next one year.
- 18.2 The shares of GGENG are trading below the book value and hence, 5 to 6 times growth is feasible in the scrip considering the market capitalisation.
- 18.3 The company has received 600 crores worth of order from West Bengal government for manufacturing transformers and other heavy electricals. There is an estimated profit of around 150 crores in coming days.
- 18.4 The company has shown growth since last 4 quarters as seen from its revenue and profits.
- 18.5 The company is debt free and the holding of promoters is very less making it difficult for entities to manipulate the share price.
- 18.6 All the technical indicators of GGENG indicate that the shares of this company may be bought and thus, the video has appealed to investors to invest in the stock of GGENG.
- 18.7 The contents of both the videos are on same lines as above with a recommendation to purchase the shares of GGENG.
- 18.8 Screenshots of the videos mentioned above and as shared by BSE is given below:



18.9 The close price mentioned in the video was matching with the close price of GGENG on December 2, 2022 i.e., Rs. 1.77/-. The video was uploaded on YouTube through 2 Channels on December 4, 2022. Hence, it is reasonably assumed that the videos were recorded on December 2, 2022 (after market hours) or after December 2, 2022 and posted on YouTube channels on December 4, 2022 (i.e. Sunday).

18.10 The video could not be accessed from YouTube during the investigation from the above two weblinks (Link 1: <https://www.youtube.com/watch?v=cgOkKRURmg> and Link 2: <https://www.youtube.com/watch?v=Fgk57HXv0ZE> as it was deleted from the YouTube.

18.11 While sharing the following video links provided in the table below, Google was requested to provide certain information related to channel administrator, IP details, details of payments received with respect to these two videos etc.:

| Video no. | Link                                                                                                                                     | Channel Name | Posted on        |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------|--------------|------------------|
| Video 1   | <a href="https://www.youtube.com/watch?v=cgOkKRURmg">https://www.youtube.com/watch?v=cgOkKRURmg</a><br>(Playback ID: xP9Gb4TdQiDnZRMm)   | Profit Yatra | December 4, 2022 |
| Video 2   | <a href="https://www.youtube.com/watch?v=Fgk57HXv0ZE">https://www.youtube.com/watch?v=Fgk57HXv0ZE</a><br>(Playback ID: LGu2epxX5h-5PGH4) | Midcap Calls |                  |

18.12 Corresponding to the aforesaid YouTube Video/Links, Google in its reply dated October 17, 2023, has provided the Sign up IP address and Upload IP Address corresponding to the Youtube Links as produced below:

- **Video 1- YouTube (Link 1:**  
<https://www.youtube.com/watch?v=cgOkKRURmg>)

| Link- <a href="https://www.youtube.com/watch?v=cgOkKRURmg">https://www.youtube.com/watch?v=cgOkKRURmg</a> |               |                                         |              |            |               |
|-----------------------------------------------------------------------------------------------------------|---------------|-----------------------------------------|--------------|------------|---------------|
| Basic Subscriber Information                                                                              |               |                                         |              |            |               |
| Channel URL                                                                                               | Signup Email  | Signup IP                               | Display Name | First Name | Date Of Birth |
| /@profitatya1675                                                                                          | (unconfirmed) | 2409:4050:2dbf:8e0d:9dba:573f:b857:4040 | profit yatra | unknown    | 01/01/2023    |

| Link- <a href="https://www.youtube.com/watch?v=cgOkKRURmg">https://www.youtube.com/watch?v=cgOkKRURmg</a> |                     |                  |                |             |            |
|-----------------------------------------------------------------------------------------------------------|---------------------|------------------|----------------|-------------|------------|
| Video Metadata                                                                                            |                     |                  |                |             |            |
| Time Created                                                                                              | Time Published      | Time Deleted     | Upload IP      | Duration    | View Count |
| 2022-12-04 09:00:10                                                                                       | 2022-12-04 09:04:23 | 26/09/2023 17:49 | 103.219.228.17 | 125 seconds | 23,28,304  |

- **Video 2- YouTube (Link 1:**  
<https://www.youtube.com/watch?v=Fgk57HXv0ZE>)

| Link- <a href="https://www.youtube.com/watch?v=Fgk57HXv0ZE">https://www.youtube.com/watch?v=Fgk57HXv0ZE</a> |                                            |                 |              |            |           |               |
|-------------------------------------------------------------------------------------------------------------|--------------------------------------------|-----------------|--------------|------------|-----------|---------------|
| Subscriber Information                                                                                      |                                            |                 |              |            |           |               |
| Channel URL                                                                                                 | Signup Email                               | Signup IP       | Display Name | First Name | Last Name | Date Of Birth |
| /@midcapcalls7275                                                                                           | manishmishra241083@gmail.com (unconfirmed) | 122.170.172.142 | MIDCAP CALLS | Manish     | Mishra    | 01/01/1983    |

| Link- <a href="https://www.youtube.com/watch?v=Fgk57HXv0ZE">https://www.youtube.com/watch?v=Fgk57HXv0ZE</a> |                     |                     |                |             |            |
|-------------------------------------------------------------------------------------------------------------|---------------------|---------------------|----------------|-------------|------------|
| Subscriber Information                                                                                      |                     |                     |                |             |            |
| Time Created                                                                                                | Time Published      | Time Deleted        | Upload IP      | Duration    | View Count |
| 04/12/2022 09:05:00                                                                                         | 04/12/2022 09:07:47 | 26/09/2023 17:30:32 | 103.219.228.17 | 228 seconds | 21,60,577  |

18.13 From the aforesaid reply of Google, it is observed that both videos were uploaded from the same IP address and were uploaded and deleted on the same date around same time. The videos received more than 20,00,000 counts as informed by Google in its response. Further, on searching the aforementioned Upload IP Address on Website <https://whatismyipaddress.com>, it was observed that the upload IP address was provided by Internet Service Provider named FusionNet. The details as gathered from the said website is provided below:



FusionNet provides services at Ahmedabad, Greater Noida, Noida, Ghaziabad, Gurugram and Mohali (as on October 9, 2024 gathered from [www.fusion.net.in](http://www.fusion.net.in)).

18.14 Further, while sharing the Upload IP address of the above 2 Videos, details like hostname, registered name along with KYC & Customer Application Form (CAF) and exact location for the IP addresses were sought from FusionNet. FusionNet, in its response, stated that "We are using CGNAT for our Broadband subscriber, in this case one Public IP may be NAT with multiple users although we have pulled data against the info provided by you and found some users". FusionNet provided details of 14 users to whom the said upload IP Address were allotted on December 04, 2022 between 08:59:00 to 09:07:00. Out of these 14 names, one of the users was Ms. Anshu Mishra. (Reply of FusionNet is placed at Annexure 5). The details of Ms. Anshu Mishra are provided below:

| Customer Name | Mobile No  | Mail Id                     | Address                                                          |
|---------------|------------|-----------------------------|------------------------------------------------------------------|
| Anshu Mishra  | 7300634572 | anshumishramanish@gmail.com | Flat no -C 11 North park villa ADANI SHANTIGRAM AHMEDABAD GUJRAT |

- 18.15 FusionNet has also shared the CAF and Aadhaar details of Ms. Anshu Mishra. From the CAF shared by FusionNet, it is clear that Ms. Anshu Mishra is the wife of Shri Manish Mishra. In terms of the statement recording of Shri Manish Mishra on June 28, 2024 under Section 11C(5) of the SEBI Act, 1992 (placed at **Annexure 6**), Shri Manish Mishra informed that email ID anshumishramanish@gmail.com and mobile number 7300634572 belongs to him / his spouse. Shri Mishra also informed that he operates the account of his wife. This email id and mobile number matches with the email id and mobile number provided in the table above. Further, the address given in above table also matches with the address provided at the time of statement recording.
19. At the time of statement recording, Shri Mishra was asked the following question:  
"How many Youtube channels you run?"  
**Reply- Money wise, Advisor, Mist Music, Profit Yatra, Midcap Call. I don't remember whether these channels are still being used."**  
Thus, Shri Manish Mishra has accepted that both the channels (wherein the misleading videos of GGENG were uploaded) pertained / run to / by him.
20. Hence, based on the submissions of Google, FusionNet and Shri Manish Mishra, Youtube channels i.e. Profit Yatra and Midcap Calls belonged / were owned by Shri Manish Mishra.
21. In the two ex parte interim orders dated March 2, 2023 pertaining to Sadhna Broadcast Limited and Sharpline Broadcast Limited, it is seen that the YouTube Channels – 'Midcap Calls' and 'Profit Yatra', were created on January 23, 2022 and September 25, 2021.
22. From the data provided by the Google, it can be observed that both the YouTube videos had more than 20 Lakh View Counts. Based on submissions of Google, FusionNet and Shri Manish Mishra, it is observed that the videos were uploaded by Shri Manish Mishra. It is also observed that from the bank statement of Kotak Mahindra Bank (copy placed at **Annexure 7**) that during the period from November 21, 2022 to December 06, 2022, Shri Manish Mishra paid Rs. 1,27,95,990/- to Google AdSense (Google delivers targeted ads to their content or audience) for promoting videos uploaded on the YouTube. The payment details are given below:

| S.No | Date       | Narration of the transaction | Amount      |
|------|------------|------------------------------|-------------|
| 1.   | 21/11/2022 | PG GOOGLEADS                 | 9,99,999.00 |
| 2.   | 22/11/2022 | PG GOOGLEADS                 | 9,99,998.00 |
| 3.   | 26/11/2022 | PG GOOGLEADS                 | 8,99,999.00 |
| 4.   | 27/11/2022 | PG GOOGLEADS                 | 9,99,000.00 |
| 5.   | 28/11/2022 | PG GOOGLEADS                 | 9,00,000.00 |
| 6.   | 29/11/2022 | PG GOOGLEADS                 | 9,99,000.00 |
| 7.   | 30/11/2022 | PG GOOGLEADS                 | 9,99,999.00 |
| 8.   | 01/12/2022 | PG GOOGLEADS                 | 9,99,000.00 |
| 9.   | 02/12/2022 | PG GOOGLEADS                 | 9,99,000.00 |

|     |            |              |             |
|-----|------------|--------------|-------------|
| 10. | 03/12/2022 | PG GOOGLEADS | 9,99,999.00 |
| 11. | 04/12/2022 | PG GOOGLEADS | 9,99,998.00 |
| 12. | 05/12/2022 | PG GOOGLEADS | 9,99,999.00 |
| 13. | 06/12/2022 | PG GOOGLEADS | 9,99,999.00 |

With respect to the misleading videos in the scrip of GGENG specific payment details were sought from Google, however, no response is received. Hence, it cannot be specifically concluded that above payment(s) were made towards the misleading videos in the scrip of GGENG.

23. It is also noted from corporate announcement section that GGENG vide its letter dated January 7, 2023 (placed at **Annexure 8**) has clarified to BSE that *"This is in reference to the clarification sought by the Stock Exchange on 7th December, 2022 on various stock recommendations of G G Engineering Limited ("the Company") and the news that Company has bagged order of 600 crore from Govt. of West Bengal, which are being circulated on youtube.*

*As per the provisions of Regulation 30 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, we wish to inform you that whatever is being circulated on youtube regarding the Company's stock and the news about the Company, as mentioned above, is false and misleading. We have no connection with this fake news. Also, we are not in agreement with the matter so circulated.*

*Further, the Company has also lodged a Complaint at Cyber Cell against such misleading activities in order to protect the interest of investors and shareholders. We also confirm that there is no pending information or announcement that may have a bearing on the operation/ performance of the company."*

24. Thus, it is alleged from the clarification provided by the company that the information contained in the videos uploaded in two YouTube channels was false and provided misleading information about GGENG. Further, no disclosure was observed to be made by the company to BSE regarding the outcome of the aforesaid complaint to Cyber Cell.
25. SEBI carried out a search and seizure operation on March 2, 2023 at the residence of Manish Mishra and entities associated with him. During the said operation, the backup of various devices – laptop / mobile owned by Manish Mishra was obtained. On analysis of said backup data, it is observed that the videos shared by BSE were also available in the google drives of Shri Manish Mishra. The sample screenshot gathered from google drive of Shri Manish Mishra which also matched with the contents of videos shared by BSE placed in above points like buy recommendation with current market price (Rs.1.77/-), 3 months target (Rs.20/-) and 1 year target (Rs.100/-):
26. On December 7, 2022, Shri Sunil Bhandari shared certain screenshots of various videos of GGENG on WhatsApp with Shri Manish Mishra. Shri Mishra responded that videos have been uploaded in various languages viz. Hindi, Tamil, Telugu and Bengali and videos in Malayalam and Punjabi will be uploaded by evening i.e.

December 7, 2022. Chat details between Shri Bhandari with Shri Mishra on WhatsApp on December 7, 2022 is provided below:



27. On December 9, 2022, Shri Sunil Bhandari shares a sheet of buyers and sellers in the scrip of GGENG with Shri Manish Mishra. Shri Manish Mishra informs Shri Bhandari that videos played in South had such an effect that the buyers in the shares of GGENG are from South India as seen from the surnames (provided in the list of buyers and sellers who traded in GGENG on December 09, 2022). The chat details between them are placed at **Annexure 9**.



28. It is alleged that there was a well laid down plan to generate volumes in the scrip of GGENG after having uploaded the video on December 4, 2022 which was a Sunday. It is also observed from the above chats that after having uploaded the 2 videos on December 4, 2022, some more videos were uploaded in Hindi, Bengali, Tamil and Telugu.
29. It is alleged from the above that Manish Mishra intentionally planted the false and misleading information about GGENG through the YouTube videos and recommended to buy shares of GGENG. It is also observed from the analysis that the false and misleading videos circulated by Manish Mishra has impacted the

volumes in the scrip and attracted new investors. Thus, it is alleged from the above chats that uploading of such videos is part of a larger well-orchestrated premeditated plan to induce investors to buy the scrip of GGENG so as to facilitate offloading the shares of GGENG for certain sets of individuals / investors.

### Impact of misleading YouTube videos in the scrip of GGENG

30. It is observed that pursuant to the false and misleading videos uploaded on December 4, 2022 (i.e. Sunday), the volumes increased from December 5, 2022. The price of the scrip increased from close price of Rs.1.77/- on December 2, 2022 (i.e. Friday) to close price of Rs. 1.85/- on December 5, 2022 (i.e. Monday) to Rs. 1.93/- on December 6, 2022. However, the price of the scrip fell to Rs. 1.75/- on December 12, 2022. The price volume data for the month of December 2022 as provided below demonstrates that the volumes increased significantly from December 5, 2022 to December 12, 2022 and reached the highest volume of 4,47,41,384 shares on December 7, 2022 with a daily average volume of 2,80,82,251.83 shares during the period December 5, 2022 to December 12, 2022 (6 trading days). It is noted that the average volume during the period September 19, 2022 to December 4, 2022 (i.e. pre-video patch) was 13,94,964.37 shares in 52 trading days. The price of the scrip decreased from Rs. 3.08/- to Rs. 1.77/- in 52 working days (pre-video patch).

| Date      | Open Price | High Price | Low Price | Close Price | No. of Shares | No. of Trades |
|-----------|------------|------------|-----------|-------------|---------------|---------------|
| 01-Dec-22 | 1.74       | 1.74       | 1.67      | 1.7         | 458004        | 439           |
| 02-Dec-22 | 1.7        | 1.78       | 1.68      | 1.77        | 1183014       | 496           |
| 05-Dec-22 | 1.85       | 1.85       | 1.83      | 1.85        | 27626958      | 5688          |
| 06-Dec-22 | 1.94       | 1.94       | 1.91      | 1.93        | 38492809      | 6964          |
| 07-Dec-22 | 1.99       | 2.01       | 1.84      | 1.84        | 44741384      | 5977          |
| 08-Dec-22 | 1.88       | 1.93       | 1.87      | 1.93        | 23589427      | 3016          |
| 09-Dec-22 | 1.97       | 2          | 1.84      | 1.84        | 28571394      | 2725          |
| 12-Dec-22 | 1.75       | 1.75       | 1.75      | 1.75        | 5471539       | 1469          |
| 13-Dec-22 | 1.67       | 1.74       | 1.67      | 1.67        | 3936330       | 1384          |
| 14-Dec-22 | 1.64       | 1.64       | 1.64      | 1.64        | 815079        | 525           |
| 15-Dec-22 | 1.61       | 1.61       | 1.61      | 1.61        | 2246687       | 782           |
| 16-Dec-22 | 1.58       | 1.58       | 1.58      | 1.58        | 2867456       | 933           |
| 19-Dec-22 | 1.55       | 1.55       | 1.55      | 1.55        | 1267936       | 538           |
| 20-Dec-22 | 1.52       | 1.52       | 1.52      | 1.52        | 780302        | 468           |
| 21-Dec-22 | 1.49       | 1.55       | 1.49      | 1.49        | 6589244       | 1374          |
| 22-Dec-22 | 1.47       | 1.47       | 1.47      | 1.47        | 293172        | 305           |
| 23-Dec-22 | 1.45       | 1.45       | 1.45      | 1.45        | 195163        | 239           |
| 26-Dec-22 | 1.43       | 1.43       | 1.43      | 1.43        | 578716        | 363           |
| 27-Dec-22 | 1.41       | 1.41       | 1.41      | 1.41        | 342622        | 304           |
| 28-Dec-22 | 1.39       | 1.39       | 1.39      | 1.39        | 373976        | 280           |
| 29-Dec-22 | 1.37       | 1.37       | 1.37      | 1.37        | 211413        | 281           |
| 30-Dec-22 | 1.35       | 1.35       | 1.35      | 1.35        | 278664        | 306           |

31. It is observed that 9,781 unique clients have traded in Patch 1 (pre-video) i.e., September 19, 2022 to December 4, 2022. It is also observed that 11,862 unique clients have traded after the video upload in Patch 2 i.e., December 5, 2022 to December 12, 2022. Further, it is noted that 1,407 common unique clients have traded in both the patches. Hence, 10,455 new clients have traded after the video upload i.e., during the period from December 5, 2022 to December 12, 2022. The details are given below:

| Period                      | No. of unique clients (PAN) | Common unique clients in both periods | No. of new clients traded post video upload |
|-----------------------------|-----------------------------|---------------------------------------|---------------------------------------------|
| Sep 19, 2022 - Dec 04, 2022 | 9,781                       | 1,407                                 | 10,455                                      |
| Dec 05, 2022- Dec 12, 2022  | 11,862                      | 1,407                                 |                                             |

32. During the period of 6 trading days from December 05-12, 2022, no positive corporate announcement related to business activities of the company was made by GGENG. Thus, it is alleged from the above that the false and misleading videos intentionally uploaded by Shri Manish Mishra on his YouTube channels Profit Yatra and Midcap Calls recommending to buy the scrip of GGENG has attracted many new investors in the scrip and also impacted the volumes of the scrip. The new investors got fraudulently induced to trade in the scrip of GGENG on account of the misleading videos circulated on YouTube by Shri Manish Mishra. Thus, it is alleged that Shri Manish Mishra has disseminated false and misleading information in the scrip of GGENG to public.

**Therefore, it has been alleged that Manish Mishra has violated Section 12A(a), (b), (c) of SEBI Act, 1992 read with Regulations 3(a), (b), (c), (d), 4(1), 4(2) (k) & (r) of PFUTP Regulations.**

33. During the course of investigation, it is observed that certain entities who were subscribers in the rights issue have offloaded the shares. These also included entities who were more than 1% shareholders as on September 2022. Further, certain entities of Manish Mishra Group have also offloaded the shares of GGENG acquired before December 4, 2022 or during Patch 2.

34. Based on the nature of connection / relation, the list of suspects has been divided into two groups – 'Net Sellers Group' and 'Manish Mishra Group'.

35. Net Sellers Group comprise of following entities:

| S.No. | Name of Suspect                              | PAN        |
|-------|----------------------------------------------|------------|
| 1.    | M/s Vrindaa Advanced Materials Limited       | AAECP4144R |
| 2.    | M/s Vikas Lifecare Limited                   | AADCA5571A |
| 3.    | Mr. Rajan Gupta                              | AEEPG8794H |
| 4.    | Ms. Namita Garg                              | AAOPJ0181H |
| 5.    | Mr. Vinayak Garg                             | AQQPG5523N |
| 6.    | M/s Advik Capital Limited                    | AAACQ0004H |
| 7.    | M/s Blue Square Corporate Services Pvt. Ltd. | AADCB4038M |
| 8.    | M/s Just Right Life Limited                  | AAWCS8320E |
| 9.    | Mr. Naresh Aggarwal                          | ABJPK5857F |
| 10.   | Mr. Krishan Kumar                            | AEWPK0416L |

|     |                                               |            |
|-----|-----------------------------------------------|------------|
| 11. | Ms. Urvashi Mittal                            | ASKPB4999D |
| 12. | Ms. Charu Sharad Rathi                        | ACYPR1415Q |
| 13. | Ms. Priya Mittal                              | AGBPM3239N |
| 14. | Mr. Sharad Kumar Bagga                        | ABIPB2288G |
| 15. | M/s SKSE Securities Limited Corp CMTM Prop AC | AAFCS1539J |
| 16. | Ms. Nirmal Aggarwal                           | AAZPA7513M |
| 17. | Ms. Sonakshi Mittal                           | CGPPM9221A |
| 18. | Mr. Sandeep Bansal                            | AAFPB3424Q |
| 19. | Mr. Govind Aggarwal                           | ABVPA5466G |
| 20. | Mr. Naresh Mittal                             | AFHPM9429D |
| 21. | Mr. Vikas Garg                                | AAAPG8241P |
| 22. | Mr. Jayantilal Babulal Ranka                  | AABPR8238C |
| 23. | Ms. Seema Garg                                | AAJPG3268R |
| 24. | Mr. Sharad Premprakash Rathi                  | AAFPR3291K |
| 25. | M/s Wessel Consultancy Pvt. Ltd.*             | AABCW7779E |
| 26. | Mr. Vishesh Gupta                             | AIAPG4936H |

\*This entity has not sold on net basis in Patch 2. It has squared off its position. It has been included by virtue of its relationship with other entities in Net Sellers Group

**36. Manish Mishra Group comprise of following entities:**

| S.No. | Name of Suspect                           | PAN        |
|-------|-------------------------------------------|------------|
| 1.    | Mr. Manish Mishra                         | AMPPM6823L |
| 2.    | Ms. Anshu Mishra                          | BMIPS3480H |
| 3.    | Mr. Dipak Dwivedi                         | ATDPD4055C |
| 4.    | Mr. Angad Ishwarlal Rathod                | CIUPR1814B |
| 5.    | Mr. Sunil Bhandari                        | ALZPB5747M |
| 6.    | Ms. Rekha Bhandari                        | ALHPB9175D |
| 7.    | Mr. Vijay Ghanshyambhai Pujara            | AGXPP5209R |
| 8.    | M/s Shyam HUF                             | ABAHS7715R |
| 9.    | Ms. Swati Agarwal                         | AHSPA6945R |
| 10.   | Ms. Vertika Singh                         | IYAPS6653F |
| 11.   | Ms. Meera Chopra                          | AGNPC4393B |
| 12.   | Mr. Abhinendra Singh                      | BSUPS4998G |
| 13.   | Ms. Aahuti Rasik Mistry                   | AKSPM8453F |
| 14.   | M/s Karavan Tradelink OPC Private Limited | AAGCK2880F |
| 15.   | Mr. Jatin Manubhai Shah                   | AEGPS5807M |
| 16.   | Mr. Kishansinh Mansinh Rajput             | BSFPR0253J |
| 17.   | Ms. Apoorva Agarwal                       | AMUPA5282G |

37. The connection among the suspected entities has been established based on the relationships, common directors / shareholders, fund transactions through bank accounts, WhatsApp Chats, Analysis of CDRs, off market transfers, UCC details received from exchange(s). The mobile numbers of corporate entities mentioned in their UCC details or other records have also been considered for establishing connection. CDR analysis would include calls / sms exchanged between these entities. Further, bank transactions have also been indicated, wherever available and references to certain bank transactions may be outside the IP also to indicate

strong connections and interlinkages between the entities mentioned in the table below. The bank statements highlighting various bank transactions with related / connected entities have been provided in Annexures. References to the said Annexures are provided in the table at para 38 below.

38. The list and connection / relation between all such suspected entities is given below:

| S.No. | Entity                                                                             | PAN        | Basis of Connection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------|------------------------------------------------------------------------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.    | M/s Vrindaa Advanced Materials Limited<br><br>(old name Ketav Multicorp Pvt. Ltd.) | AAECP4144R | <ul style="list-style-type: none"> <li>Entity 27 (Shri Vishesh Gupta), Entity 24 (Ms. Seema Garg) and Entity 8 (M/s Just Right Life Limited) together held 91.47% shares in FY 2022-23 in Entity 1 (M/s Vrindaa Advance Materials Limited). In FY 2021-22, Entity 27 (Shri Vishesh Gupta) and Entity 24 (Ms. Seema Garg) jointly held 88.75% in Entity 1 (M/s Vrindaa Advance Materials Limited) in FY 2021-22.</li> <li>The mobile no. of Entity 1 (M/s Vrindaa Advanced Materials Limited) is 9711179744 and 7827307357 as per UCC details from exchange. Calls exchanged between Entity 1 (M/s Vrindaa Advanced Materials Limited) and <ul style="list-style-type: none"> <li>Entity 27 (Shri Vishesh Gupta – mobile no. 9899595975 as per UCC)</li> <li>Entity 2 (M/s Vikas Lifecare Ltd. – mobile no. 9810620202 &amp; 9711144559 as per UCC). Mobile no. 9711144559 is registered in the name of Moonlite Technochem Pvt Ltd. as per UCC details. Moonlite Technochem Pvt. Ltd. is the erstwhile name of Vikas Lifecare Ltd.</li> <li>Entity 4/5 (Ms. Namita Garg/ Vinayak Garg – mobile no. 9811160866). Mobile no. 9811160866 is registered in UCC in these names including Shri Vivek Garg, spouse of Namita Garg.</li> <li>Entity 24 (Ms. Seema Garg – mobile no. 9873844885 as per UCC)</li> </ul> </li> <li>Bank transactions between Entity 1 (M/s Vrindaa Advanced Materials Limited) and Entity 2 (M/s Vikas Lifecare Ltd.), Entity 24 (Ms. Seema Garg), Entity 26 (M/s Wessel Consultancy Services Ltd.), Sunstar Realty Development Limited (wherein Entity 32 – Shri Sunil Bhandari is a Director). Copy of bank statement of DBS Bank is placed at Annexure 10.</li> <li>The address of Entity 8 (M/s Just Right Life limited), Entity 6 (M/s Advik Capital Limited) and Entity 1 (M/s Vrindaa Advanced Materials Limited) is almost similar in terms of UCC details at BSE: <ul style="list-style-type: none"> <li>Vrindaa Advanced Materials Limited - B 1 34/1 Vikas House East Punjabi Bagh</li> <li>Just Right Life Limited - F 4 34/1 Vikas House East Punjabi Bagh Delhi</li> <li>Advik Capital Limited - G-3, Vikas House, 34/1, East Punjabi Bagh Punjabi Bagh Sec- III Delhi India 110026.</li> </ul> </li> <li>As per the reply of the Broker i.e. Alankit Imaginations Ltd, Shri Hari Bhagwan Sharma, director of Entity 1 placed the orders for Entity 1 (M/s Vrindaa Advance Materials Limited). Copy of the reply of the broker dated November 25, 2024 is provided at Annexure 11.</li> </ul> |

|    |                                                                                                       |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----|-------------------------------------------------------------------------------------------------------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2. | M/s Vikas Lifecare Limited<br><br>(old names – Vikas Multicorp Limited / Moonlite Technochem Limited) | AADCA5571A | <ul style="list-style-type: none"> <li>Entity 1 (M/s Vrindaa Advanced Materials Limited), Entity 4 (Ms. Namita Garg), Entity 22 (Shri Vikas Garg), Entity 24 (Ms. Seema Garg), were, inter-alia, part of promoter group of Entity 2 (M/s Vikas Lifecare Ltd) in terms of the shareholding pattern for quarter ended September 30, 2022 and December 31, 2022 as available on website of BSE.</li> <li>Calls exchanged between Entity 2 (M/s Vikas Lifecare Limited – mobile no. 9810620202, 9711144559 and 9811230913) and               <ul style="list-style-type: none"> <li>Entity 1 (M/s Vrindaa Advanced Materials Limited – mobile no 9711179744)</li> <li>Entity 27 (Shri Vishesh Gupta – mobile no. 9899595975)</li> <li>Entity 22 (Shri Vikas Garg – mobile no. 9810273367)</li> <li>Entity 15 (Shri Sharad Bagga – mobile no. 9811332326)</li> <li>Entity 24 (Seema Garg – mobile no. 9873844885)</li> <li>Entity 4/5 (Ms. Namita Garg/ Vinayak Garg – mobile no. 9811160866). Mobile no. 9811160866 is registered in UCC in these names including Shri Vivek Garg, spouse of Namita Garg.</li> </ul> </li> <li>Bank transactions between Entity 2 (M/s Vikas Lifecare Ltd.) and Entity 1 (M/s Vrindaa Advanced Materials Limited). Copy of bank statement of DBS Bank is placed at Annexure 10.</li> <li>On September 07, 2022, there was an off-market sale of 40,000 shares of GGENG @ Rs. 0.17 per share from the account of Entity 22 (Shri Vikas Garg) to the account of Entity 2 (M/s Vikas Lifecare Ltd). The details received from depositories are provided at Annexure 12.</li> </ul> |
| 3. | Shri Rajan Gupta                                                                                      | AEEPG8794H | <ul style="list-style-type: none"> <li>He is Director of Entity 26 (Wessel Consultancy Pvt. Ltd.) since January 2019. He is the authorized signatory to the bank accounts of Wessel Consultancy Pvt. Ltd.</li> <li>Entity 26 (Wessel Consultancy Pvt. Ltd.) has bank transactions with Entity 1 (M/s Vrindaa Advanced Materials Limited). Copy of bank statement of DBS Bank is placed at Annexure 10.</li> <li>Bank transaction between Entity 3 (Shri Rajan Gupta) and Entity 24 (Ms. Seema Garg). Copy of the bank statement of Rajan Gupta is placed at Annexure 10.</li> <li>At the time of statement recording, he has confirmed that he knows Shri Sunil Bhandari, Shri Vivek Garg. Copy of the statement is placed at Annexure 13.</li> <li>Calls exchanged between Entity 3 (Shri Rajan Gupta – mobile no. 9810273117) with               <ul style="list-style-type: none"> <li>Entity 16 (SKSE Securities Ltd – mobile no. 9974377377)</li> </ul> </li> <li>On December 05, 2022, there was an off market sale of 11,00,000 shares of GGENG @1.85/- per share from the account of Entity 8 (M/s Just Right Life Limited) to the account of Entity 3 (Shri Rajan Gupta). The details received from depositories are provided at Annexure 12.</li> <li>Entity 4 (Ms. Namita Garg) and Entity 5 (Shri Vinayak Garg) have stated in their responses that Entity 3 (Shri Rajan Gupta) is a friend of her spouse / his father Shri Vivek Garg.</li> </ul>                                                                                                                                              |

|    |                                              |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----|----------------------------------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                              |             | <ul style="list-style-type: none"> <li>He knows Entity 32 (Shri Sunil Bhandari) and Shri Vivek Garg as per his statement placed at Annexure 13.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4. | Ms. Namita Garg                              | AAOPJ0181H  | <ul style="list-style-type: none"> <li>Calls exchanged between Entity 4/ 5 (Ms. Namita Garg/ Vinayak Garg (son of Ms. Namita Garg – mobile no. 9811160866/ 9899086676 / 8810238063) with               <ul style="list-style-type: none"> <li>Entity 19 (Shri Sandeep Bansal – mobile no. 9811111555)</li> <li>Entity 24 (Ms. Seema Garg – mobile no. 9873844885)</li> <li>Entity 6 (Shri Vishesh Gupta – mobile no. 9899595975)</li> <li>Entity 1 (M/s Vrindaa Advanced Materials Limited – mobile no 9711179744)</li> <li>Entity 22 (Shri Vikas Garg – mobile no. 9811054466)</li> <li>Entity 2 (M/s Vikas Lifecare- mobile no. 9711144559)</li> <li>Entity 32 (Shri Sunil Bhandari – mobile no. 9711836000, sms received on October 8, 2022)</li> </ul> </li> <li>Ms. Namita Garg is the spouse of Shri Vivek Garg and Shri Vinayak Garg is their son.</li> </ul>                                                                                                                                                                                                                                                                                                                           |
| 5. | Shri Vinayak Garg                            | AQQPG5523N  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 6. | M/s Advik Capital Limited                    | AAACQ0004H  | <ul style="list-style-type: none"> <li>There have been bank transactions between Entity 6 (M/s Advik Capital Ltd.) and M/s Srestha Finvest Ltd. and M/s Sunstar Realty Development Ltd., in both these companies Entity 32 – Shri Sunil Bhandari is a Director. Copy of bank statement is provided at Annexure 10.</li> <li>Calls exchanged between Entity 6 (M/s Advik Capital Ltd. – mobile no. 9289119978 and 9810044657) with               <ul style="list-style-type: none"> <li>Entity 22 (Shri Vikas Garg – mobile no. 9811054466)</li> <li>Entity 11 (Shri Krishan Kumar – mobile no. 9810124439)</li> </ul> </li> <li>The address of Entity 8 (M/s Just Right Life limited), Entity 6(M/s Advik Capital Limited) and Entity 1( M/s Vrindaa Advanced Materials Limited) is almost similar in terms of UCC details at BSE:               <ul style="list-style-type: none"> <li>Vrindaa Advanced Materials Limited - B 1 34/1 Vikas House East Punjabi Bagh</li> <li>Just Right Life Limited - F 4 34/1 Vikas House East Punjabi Bagh Delhi</li> <li>Advik Capital Limited - G-3, Vikas House, 34/1, East Punjabi Bagh Punjabi Bagh Sec- III Delhi India 110026</li> </ul> </li> </ul> |
| 7. | M/s Blue Square Corporate Services Pvt. Ltd. | AADCB403 8M | <ul style="list-style-type: none"> <li>Calls exchanged between Entity 7 (M/s Blue Square Corporate Services Pvt. Ltd. – mobile no. 9820120037)               <ul style="list-style-type: none"> <li>Entity 23 (Shri Jayantilal Babulal Ranka – mobile no. 9820078258)</li> <li>Entity 13 (Ms. Charu Rathi – mobile no. 9322260098)</li> <li>Entity 22 (Shri Vikas Garg – mobile no. 9811054466)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 8. | M/s Just Right Life Limited                  | AAWCS8320E  | <ul style="list-style-type: none"> <li>Bank transactions between Entity 8 (M/s Just Right Life Limited) and Entity 1 (M/s Vrindaa Advanced Materials Limited). Copy of the bank statement of DBS bank is provided at Annexure 10.</li> <li>The address of Entity 8 (M/s Just Right Life limited), Entity 6(M/s Advik Capital Limited) and Entity 1 (M/s Vrindaa Advanced Materials Limited) is almost similar in terms of UCC details at BSE:</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

|     |                                 |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----|---------------------------------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                 |            | <ul style="list-style-type: none"> <li>- Vrindaa Advanced Materials Limited - B 1 34/1 Vikas House East Punjabi Bagh</li> <li>- Just Right Life Limited - F 4 34/1 Vikas House East Punjabi Bagh Delhi</li> <li>- Advik Capital Limited - G-3, Vikas House, 34/1, East Punjabi Bagh Punjabi Bagh Sec- III Delhi India 110026.</li> <li>• On December 05, 2022, there was an off market sale (through inter depository transfer) of 11,00,000 shares of GGENG @1.85/- per share from the account of Entity 8 (Just Right Life Limited) to the account of Entity 3 (Shri Rajan Gupta). The details received from depositories are provided at Annexure 12.</li> <li>• Admittedly, Entity 1 (M/s Vrindaa Advance Material Limited) is a shareholder in their company, and they have commercial transactions and a business relationship with them. Details provided in their response placed at Annexure 14.</li> <li>• Admittedly, they have engaged in commercial transactions with Wessel Consultancy Pvt. Ltd. Details provided in their response placed at Annexure 14.</li> <li>• As per the reply of the Broker i.e. Alankit Imaginations Ltd, Hari Bhagwan Sharma, Director of Entity 8, placed the orders for Entity 8 (M/s Just Right Life Limited Limited). Copy of the reply of the broker dated November 25, 2024 is provided at Annexure 11.</li> </ul> |
| 9.  | Shri Naresh Aggarwal            | ABJPK5857F | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 9 (Shri Naresh Aggarwal – mobile no. 9810084796) with <ul style="list-style-type: none"> <li>- Entity 20 (Shri Govind Aggarwal – mobile no. 9810010489)</li> <li>- Entity 11 (Shri Krishan Kumar – mobile no. 9810124439)</li> <li>- Entity 17 (Nirmal Aggarwal – mobile no. 9811255382 and 9871015554)</li> <li>- Entity 24 (Ms. Seema Garg – mobile no. 9873844885)</li> <li>- Entity 18 (Ms. Sonakshi Bansal – mobile no. 9910571811)</li> <li>- Entity 22 (Shri Vikas Garg – mobile no. 9811054466)</li> <li>- Entity 12 (Ms. Urvashi Mittal – mobile no. 9891525343)</li> </ul> </li> <li>• As informed by the broker Centillion Capital Pvt. Ltd. vide email dated November 19, 2024, Entity 20 (Shri Govind Aggarwal), Entity 11 (Shri Krishan Kumar) and Entity 9 (Shri Naresh Aggarwal) are brothers.</li> <li>• Admittedly, Entity 24 (Ms. Seema Garg) is the daughter of his sister. Copy of his response is placed at Annexure 14.</li> </ul>                                                                                                                                                                                                                                                                                                                                  |
| 10. | Shri Vijay Ghanshyambhai Pujara | AGXPP5209R | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 10 (Shri Vijay Ghanshyambhai Pujara – mobile no. 9825255993) with <ul style="list-style-type: none"> <li>- Entity 32 (Shri Sunil Bhandari – mobile no. 9711836000)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 11. | Shri Krishan Kumar              | AEWPK0416L | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 11 (Shri Krishan Kumar – mobile no. 9810124439) with <ul style="list-style-type: none"> <li>- Entity 6 (M/s Advik Capital Ltd. – mobile no. 9810044657)</li> <li>- Entity 20 (Shri Govind Aggarwal – mobile no. 9810010489)</li> <li>- Entity 9 (Shri Naresh Aggarwal – mobile no. 9810084796)</li> <li>- Entity 24 (Ms. Seema Garg – mobile no. 9873844885)</li> <li>- Entity 34 (Shyam HUF – mobile no. 9971195789)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|     |                                           |            | <ul style="list-style-type: none"> <li>- Entity 18 (Ms. Sonakshi Mittal – mobile no. 9910571811)</li> <li>- Entity 12 (Ms. Urvashi Mittal – mobile no. 9891525343)</li> <li>- Entity 17 (Nirmal Aggarwal – mobile no. 9811255382 and 9871015554)</li> <li>• He is father of Entity 18 (Ms. Sonakshi Mittal)</li> <li>• As informed by the broker Centillion Capital Pvt. Ltd. vide email dated November 19, 2024, Entity 20 (Shri Govind Aggarwal), Entity 11 (Shri Krishan Kumar) and Entity 9 (Shri Naresh Aggarwal) are brothers.</li> </ul>                                                                                                                     |
| 12. | Ms. Urvashi Mittal                        | ASKPB4999D | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 12 (Ms. Urvashi Mittal – mobile no. 9891525343) <ul style="list-style-type: none"> <li>- Entity 11 (Shri Krishan Kumar – mobile no. 9810124439)</li> <li>- Entity 20 (Shri Govind Aggarwal – mobile no. 9810010489)</li> <li>- Entity 17 (Nirmal Aggarwal – mobile no. 9871015554)</li> <li>- Entity 9 (Shri Naresh Aggarwal – mobile no. 9810084796)</li> </ul> </li> </ul>                                                                                                                                                                                                                |
| 13. | Ms. Charu Sharad Rathi                    | ACYPR1415Q | <ul style="list-style-type: none"> <li>• She is the Director of Entity 7 (M/s Blue Square Corporate Services Pvt. Ltd.) alongwith her husband Entity 25 (Shri Sharad Premprakash Rathi).</li> <li>• Calls exchanged between Entity 13 (Ms. Charu Sharad Rathi – mobile no. 9322260098) with <ul style="list-style-type: none"> <li>- Entity 7 (Blue Square Corporate Services Pvt. Ltd. – mobile no. 9820120037)</li> </ul> </li> </ul>                                                                                                                                                                                                                             |
| 14. | Ms. Priya Mittal                          | AGBPM3239N | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 14 (Ms. Priya Mittal – mobile no. 9810027501) with <ul style="list-style-type: none"> <li>- Entity 20 (Shri Govind Aggarwal – mobile no. 9810010489)</li> <li>- Entity 19 (Shri Sandeep Bansal – mobile no. 9811111555)</li> </ul> </li> <li>• She is the spouse of Entity 21 (Shri Naresh Mittal)</li> </ul>                                                                                                                                                                                                                                                                               |
| 15. | Shri Sharad Kumar Bagga                   | ABIPB2288G | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 15 (Shri Sharad Bagga – mobile no. 9811332326) with <ul style="list-style-type: none"> <li>- Entity 2 (M/s Vikas Lifecare Ltd. – mobile no. 9810620202 and 9711144559)</li> <li>- Entity 27 (Shri Vishesh Gupta – mobile no. 9899595975)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                             |
| 16. | SKSE Securities Limited Corp CMTM Prop AC | AAFCS1539J | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 16 (SKSE Securities Limited – mobile no. 9974377377) <ul style="list-style-type: none"> <li>- Entity 3 (Shri Rajan Gupta – mobile no. 9810273117)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 17. | Ms. Nirmal Aggarwal                       | AAZPA7513M | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 17 (Nirmal Aggarwal – mobile no. 9811255382 and 9871015554) <ul style="list-style-type: none"> <li>- Entity 20 (Shri Govind Aggarwal – mobile no. 9810010489)</li> <li>- Entity 11 (Shri Krishan Kumar – mobile no. 9810124439)</li> <li>- Entity 9 (Shri Naresh Aggarwal – mobile no. 9810084796)</li> <li>- Entity 12 (Ms. Urvashi Mittal – mobile no. 9891525343)</li> <li>- Entity 18 (Ms. Sonakshi Mittal – mobile no. 9910571811)</li> <li>- Entity 24 (Ms. Seema Garg – mobile no. 9873844885)</li> <li>- Entity 22 (Shri Vikas Garg – mobile no. 9811054466)</li> </ul> </li> </ul> |

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|-----|--------------------------------------------------------------------------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 18. | Ms. Sonakshi Mittal<br><br>(Ms. Sonakshi Bansal is also the same entity) | CGPPM9221A | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 18 (Ms. Sonakshi Mittal – mobile no. 9910571811) with               <ul style="list-style-type: none"> <li>- Entity 20 (Shri Govind Aggarwal – mobile no. 9810010489),</li> <li>- Entity 11 (Shri Krishan Kumar – mobile no. 9810124439),</li> <li>- Entity 9 (Shri Naresh Aggarwal – mobile no. 9810084796),</li> <li>- Entity 17 (Nirmal Aggarwal – mobile no. 9811255382 and 9871015554)</li> </ul> </li> <li>• She is the daughter of Entity 11 (Shri Krishan Kumar) as confirmed by broker Centillion Capital Pvt. Ltd. vide email dated November 19, 2024</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 19. | Shri Sandeep Bansal                                                      | AAFPB3424Q | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 19 (Shri Sandeep Bansal – mobile no. 9811111555) with               <ul style="list-style-type: none"> <li>- Entity 14 (Ms. Priya Mittal – mobile no. 9810027501)</li> <li>- Entity 4/5 (Ms. Namita Garg/ Vinayak Garg – mobile no. 9811160866 – which is registered in UCC in these names including Shri Vivek Garg, spouse of Namita Garg). Mobile no. 9811160866 is registered in UCC in all these 2 names.</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 20. | Shri Govind Aggarwal                                                     | ABVPA5466G | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 20 (Shri Govind Aggarwal – mobile no. 9810010489)               <ul style="list-style-type: none"> <li>- Entity 14 (Ms. Priya Mittal – mobile no. 9810027501)</li> <li>- Entity 12 (Ms. Urvashi Mittal – mobile no. 9891525343)</li> <li>- Entity 11 (Shri Krishan Kumar – mobile no. 9810124439)</li> <li>- Entity 9 (Shri Naresh Aggarwal – mobile no. 9810084796)</li> <li>- Entity 17 (Ms. Nirmal Aggarwal – mobile no. 9811255382 and 9871015554)</li> <li>- Entity 18 (Ms. Sonakshi Mittal – mobile no. 9910571811)</li> </ul> </li> <li>• As informed by the broker Centillion Capital Pvt. Ltd. vide email dated November 19, 2024, Entity 20 (Shri Govind Aggarwal), Entity 11 (Shri Krishan Kumar) and Entity 9 (Shri Naresh Aggarwal) are brothers.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 21. | Shri Naresh Mittal                                                       | AFHPM9429D | <ul style="list-style-type: none"> <li>• He is the spouse of Entity 14 (Ms. Priya Mittal).</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 22. | Shri Vikas Garg                                                          | AAAPG8241P | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 22 (Shri Vikas Garg – mobile no. 9810273367) with               <ul style="list-style-type: none"> <li>- Entity 24 (Ms. Seema Garg – mobile no. 9873844885)</li> <li>- Entity 7 (M/s Blue Square Corporate Services Ltd. – mobile no. 9820120037)</li> <li>- Entity 9 (Shri Naresh Aggarwal – mobile no. 9810084796)</li> <li>- Entity 4/5 (Ms. Namita Garg/ Vinayak Garg – mobile no. 9811160866). Mobile no. 9811160866 is registered in UCC in these names including Shri Vivek Garg, spouse of Namita Garg</li> <li>- Entity 17 (Nirmal Aggarwal – mobile no. 9811255382)</li> <li>- Entity 2 (M/s Vikas Lifecare Ltd. – mobile no. 9711144559)</li> <li>- Entity 6 (M/s Advik Capital Ltd. – mobile no. 9810044657)</li> </ul> </li> <li>• There are bank transactions between Entity 22 (Shri Vikas Garg) with Srestha Finvest Ltd. and M/s Sunstar Realty Development Ltd. (Entity 32 - Shri Sunil Bhandari is a Director in M/s Srestha Finvest Ltd. and M/s Sunstar Realty Development Ltd.) Copies of the bank statements are placed at Annexure 10.</li> <li>• On September 07, 2022, there was an off-market sale of 40,000 shares of GGENG @ Rs. 0.17 per share from the account of Entity 22 (Shri</li> </ul> |

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|-----|-------------------------------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                               |            | <p>Vikas Garg) to the account of Entity 2 (M/s Vikas Lifecare Ltd). The details received from depositories are provided at Annexure 12.</p> <ul style="list-style-type: none"> <li>• He is the spouse of Entity 24 (Ms. Seema Garg) and brother of Shri Vivek Garg</li> <li>• He knows Entity 25 (Shri Sharad Premprakash Rathi) socially as confirmed by Entity 7 (M/s Blue Square Corporate Services Private Limited) in their response placed at Annexure 14.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 23. | Shri Jayantilal Babulal Ranka | AABPR8238C | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 23 (Shri Jayantilal Babulal Ranka – mobile no. 9820078258) with <ul style="list-style-type: none"> <li>- Entity 7 (M/s Blue Star Corporate Services Pvt. Ltd. – mobile no. 9820120037).</li> </ul> </li> <li>• He is friend of Entity 25 (Shri Sharad Premprakash Rathi) as confirmed by Entity 7 (M/s Blue Square Corporate Services Private Limited) in their response placed at Annexure 14.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 24. | Ms. Seema Garg                | AAJPG3268R | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 24 (Ms Seema Garg – mobile no. 9873844885) with <ul style="list-style-type: none"> <li>- Entity 1 (M/s Vrindaa Advanced Materials Limited – mobile no 9711179744)</li> <li>- Entity 6 (Shri Vishesh Gupta – mobile no. 9899595975)</li> <li>- Entity 4 (Ms. Namita Garg – mobile no. 9899086676)</li> <li>- Entity 11 (Shri Krishan Kumar – mobile no. 9810124439)</li> <li>- Entity 9 (Shri Naresh Aggarwal – mobile no. 9810084796)</li> <li>- Entity 17 (Ms. Nirmal Aggarwal – mobile no. 9811255382)</li> <li>- Entity 22 (Shri Vikas Garg – mobile no. 9811054466 and 9810273367)</li> <li>- Entity 4/5 (Ms. Namita Garg/ Vinayak Garg – mobile no. 9811160866). Mobile no. 9811160866 is registered in UCC in these names including Shri Vivek Garg, spouse of Namita Garg.</li> <li>- Entity (M/s Vikas Lifecare Ltd – mobile no. 9711144559)</li> </ul> </li> <li>• Bank transaction between Entity 24 (Ms. Seema Garg) and Entity 3 (Shri Rajan Gupta). Copy of the bank statement is placed at Annexure 10.</li> <li>• Bank transaction between Entity 24 (Ms. Seema Garg) and Entity 1 (M/s Vrindaa Advanced Materials Limited). Copy of the bank statement is placed at Annexure 10.</li> <li>• She is the spouse of Entity 22 (Shri Vikas Garg) and is the daughter of Entity 9 (Shri Naresh Aggarwal's) sister.</li> </ul> |
| 25. | Shri Sharad Premprakash Rathi | AAFPR3291K | <ul style="list-style-type: none"> <li>• He is spouse of Entity 13 (Ms. Charu Rathi).</li> <li>• Director of Entity 7 (M/s Blue Square Corporate Services Private Limited) alongwith his spouse Entity 13 (Ms. Charu Rathi). Both were appointed in April 2008.</li> <li>• He is friend of Entity 23 (Shri Jayantilal Babulal Ranka) and knows Entity 22 (Shri Vikas Garg) socially as confirmed by Entity 7 (M/s Blue Square Corporate Services Private Limited) in their response placed at Annexure 14.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|     |                                  |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 26. | M/s Wessel Consultancy Pvt. Ltd. | AABCW7779E | <ul style="list-style-type: none"> <li>Entity 3 (Shri Rajan Gupta) is the Director of Entity 26 (M/s Wessel Consultancy Pvt. Ltd.).</li> <li>Shri Rajan Gupta has accepted that he is the authorized signatory of Entity 26 (M/s Wessel Consultancy Pvt. Ltd.) for bank transactions as confirmed during the statement recording.</li> <li>Shri Rajan Gupta takes the trading decisions for Entity 26 (M/s Wessel Consultancy Pvt. Ltd.) as confirmed during the statement recording.</li> <li>There are bank transactions of Entity 26 (M/s Wessel Consultancy Pvt. Ltd.) with M/s Sunstar Realty Development Limited. and M/s Srestha Finvest Ltd. Copy of the bank statement placed at Annexure 10.</li> </ul> <p>(Entity 32 Shri Sunil Bhandari) is the Director of M/s Sunstar Realty Development Limited and Srestha Finvest Ltd.)</p> <ul style="list-style-type: none"> <li>Bank transactions between Entity 26 (M/s Wessel Consultancy Services Ltd.) and Entity 1 (M/s Vrindaa Advanced Materials Limited). Copy of bank statement is placed at Annexure 10.</li> </ul>                                                                                                               |
| 27. | Shri Vishesh Gupta               | AIAPG4936H | <ul style="list-style-type: none"> <li>He is one of the major shareholders of Entity 1 (M/s Vrindaa Advanced Materials Limited) in FY 2022-23.</li> <li>Calls exchanged between Entity 27 (Shri Vishesh Gupta – mobile no. 9899595975) with <ul style="list-style-type: none"> <li>Entity 1 (M/s Vrindaa Advanced Materials Limited – mobile no 9711179744)</li> <li>Entity 2 (M/s Vikas Lifecare Ltd. – mobile no. 9810620202, 9711144559 &amp; 9811230913). Mobile no. 9811230913 is registered in the name of Vikas Multicorp Limited and Ketav Multicorp Private Limited in terms of UCC provided by BSE.</li> <li>Entity 4/5 (Ms. Namita Garg/ Vinayak Garg – mobile no. 9811160866). Mobile no. 9811160866 is registered in UCC in these names including Shri Vivek Garg, spouse of Namita Garg.</li> <li>Entity 4 (Ms. Namita Garg – mobile no. 9899086676)</li> <li>Entity 24 (Ms. Seema Garg – mobile no. 9873844885)</li> <li>Entity 15 (Shri Sharad Bagga – mobile no. 9811332326)</li> </ul> </li> <li>He has bank transactions with M/s Srestha Finvest Ltd., wherein Entity 32 (Shri Sunil Bhandari) is the Director. Copy of bank statement is placed at Annexure 10.</li> </ul> |
| 28. | Shri Manish Mishra               | AMPPM6823L | <ul style="list-style-type: none"> <li>Uploader of YouTube Video</li> <li>Calls exchanged between Entity 28 (Shri Manish Mishra – mobile no. 8860691117 and 9276000000) <ul style="list-style-type: none"> <li>Entity 31 (Shri Angad Ishwarlal Rathod – mobile no. 8866859336)</li> <li>Entity 29 (Ms. Anshu Mishra – mobile no. 7300634572)</li> <li>Entity 30 (Shri Dipak Dwivedi – mobile no. 9999944813)</li> <li>Entity 41 (Shri Jatin Shah – mobile no. 9825011486)</li> <li>Entity 32 (Shri Sunil Bhandari – mobile no. 9711836000)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|     |                             |            | <ul style="list-style-type: none"> <li>- Entity 39 (Ms. Aahuti Rasik Mistry – mobile no. 9892124579)</li> <li>- Entity 35 (Ms. Swati Agarwal – mobile no. 7505926357)</li> <li>- Entity 36 (Ms. Vertika Singh – mobile no.9643531379)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 29. | Ms. Anshu Mishra            | BMIPS3480H | <ul style="list-style-type: none"> <li>• Spouse of Shri Manish Mishra (Entity 28).</li> <li>• Trading Account handled by spouse as confirmed at the time of statement recording. Copy of the recorded statement is placed at Annexure 6.</li> <li>• Calls exchanged between Entity 29 (Ms. Anshu Mishra – mobile no. 7300634572) with <ul style="list-style-type: none"> <li>- Entity 30 (Shri Dipak Dwivedi - mobile no. 9999044813 and 9999944813)</li> <li>- Entity 35 (Ms. Swati Agarwal – mobile no. 7505926357)</li> <li>- Entity 36 (Ms. Vertika Singh – mobile no. 9643531379)</li> <li>- Entity 43 (Ms. Apoorva Agarwal – mobile no. 8800667972).</li> <li>- Entity 28 (Shri Manish Mishra – mobile no. 8860691117 and 9276000000)</li> </ul> </li> <li>• She is a Director of Laddu Gopal Ventures Private Limited along with Entity 30 (Shri Dipak Dwivedi). Bank transactions of M/s Laddugopal Ventures Pvt. Ltd. are observed with <ul style="list-style-type: none"> <li>- M/s Srestha Finvest Ltd., wherein Entity 32 (Shri Sunil Bhandari) is Director</li> <li>- Entity 42 (Kishansingh Mansin)</li> <li>- Entity 30 (Dipak Dwivedi)</li> </ul> </li> </ul> <p>Copy of bank statement of Laddugopal Ventures Pvt. Ltd. is placed at Annexure 10.</p> |
| 30. | Shri Dipak Dwivedi          | ATDPD4055C | <ul style="list-style-type: none"> <li>• He is the Director of Laddu Gopal Ventures Private Limited along with Entity 29 (Ms. Anshu Mishra). Both of them were appointed in February 2022.</li> <li>• He alongwith Entity 29 (Ms. Anshu Mishra) is also Director of Kangaroo And Joey Healthcare Private Limited, both appointed in October 2022.</li> <li>• He is cousin of Entity 28 (Shri Manish Mishra) as per statement recording of Manish Mishra dated June 28, 2024</li> <li>• Calls exchanged between Entity 30 (Shri Dipak Dwivedi – mobile no. 9999044813 and 9999944813) with <ul style="list-style-type: none"> <li>- Entity 29 (Ms. Anshu Mishra – mobile no. 7300634572)</li> <li>- Entity 28 (Shri Manish Mishra – mobile no. 8860691117 and 9276000000)</li> <li>- Entity 36 (Ms. Vertika Singh – mobile no. 9643531379)</li> <li>- Entity 41 (Shri Jatin Shah – mobile no. 9825011486)</li> <li>- Entity 39 (Ms. Aahuti Mistry – mobile no. 9892124579)</li> <li>- Entity 40 (Karavan Tradelink OPC Private Ltd.– mobile no. 9925011486).</li> </ul> </li> </ul>                                                                                                                                                                                     |
| 31. | Shri Angad Ishwarlal Rathod | CIUPR1814B | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 31 (Shri Angad Ishwarlal Rathod - mobile No. 8866859336) with <ul style="list-style-type: none"> <li>- Entity 40 (M/s Karavan Tradelink OPC Private Limited - mobile no. 9925011486)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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|-----|---------------------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                     |            | <ul style="list-style-type: none"> <li>- Entity 28 (Shri Manish Mishra – mobile no. 8860691117 and 9276000000)</li> <li>- Entity 41 (Shri Jatin Shah – mobile no. 9825011486).</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 32. | Shri Sunil Bhandari | ALZPB5747M | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 32 (Shri Sunil Bhandari – mobile no. 9711836000) and               <ul style="list-style-type: none"> <li>- Entity 28 (Shri Manish Mishra – mobile no. 8860691117 and 9276000000) with</li> <li>- Entity 34 (Shyam HUF – mobile no. 9971195789)</li> <li>- Entity 10 (Vijay Ghanshyam Pujara – mobile no. 9825255993)</li> <li>- Entity (Ms. Namita Garg/ Vinayak Garg – mobile no. 9811160866)</li> </ul> </li> <li>• Admittedly, he knows Entity 22 (Shri Vikas Garg) and Entity 3 (Shri Rajan Gupta) as seen from his statement placed at Annexure 15.</li> <li>• Bank transactions of M/s Srestha Finvest Ltd. with               <ul style="list-style-type: none"> <li>- Entity 27 (Shri Vishesh Gupta)</li> <li>- Entity 26 (M/s Wessel Consultancy Pvt Ltd.)</li> <li>- Laddugopal Ventures Ltd.</li> <li>- Entity 6 (Advik Capital Ltd.)</li> <li>- Entity 22 (Shri Vikas Garg)</li> </ul> </li> <li>• Bank transactions of M/s Sunstar Realty Development Ltd. with               <ul style="list-style-type: none"> <li>- Entity 26 (M/s Wessel Consultancy Pvt Ltd.)</li> <li>- Entity 6 (M/s Advik Capital Ltd.)</li> <li>- Entity 22 (Shri Vikas Garg)</li> <li>- Entity 1 (M/s Vrindaa Advanced Materials Limited)</li> </ul>               Entity 32(Shri Sunil Bhandari) is Director in M/s Srestha Finvest Ltd. and M/s Sunstar Realty Development Ltd.             </li> <li>• He is the husband of Entity 33 (Ms. Rekha Bhandari).</li> </ul> |
| 33. | Ms. Rekha Bhandari  | ALHPB9175D | <ul style="list-style-type: none"> <li>• She is spouse of Entity 32 (Shri Sunil Bhandari).</li> <li>• He also operated her trading account as confirmed at the time of statement recording. Copy of the statement is placed at Annexure 15.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 34. | Shyam HUF           | ABAHS7715R | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 34 (Shyam HUF– mobile no. 9971195789)               <ul style="list-style-type: none"> <li>- Entity 11 (Shri Krishan Kumar – mobile no. 9810124439)</li> <li>- Entity 32 (Shri Sunil Bhandari – mobile no. 9711836000)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 35. | Ms. Swati Agarwal   | AHSPA6945R | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 35 (Ms. Swati Agarwal – mobile no. 7505926357) with               <ul style="list-style-type: none"> <li>- Entity 29 (Ms. Anshu Mishra – mobile no. 7300634572)</li> <li>- Entity 43 (Ms. Apoorva Agarwal – mobile no. 8800667972)</li> <li>- Entity 28 (Shri Manish Mishra – mobile no. 9276000000 and 8860691117)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 36. | Ms. Vertika Singh   | IYAPS6653F | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 36 (Ms. Vertika Singh – mobile no. 9643531379) with               <ul style="list-style-type: none"> <li>- Entity 29 (Ms. Anshu Mishra – mobile no. 7300634572)</li> <li>- Entity 28 (Shri Manish Mishra – mobile no. 9276000000 and 8860691117)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|     |                                           |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----|-------------------------------------------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                           |            | <ul style="list-style-type: none"> <li>- Entity 30 (Shri Dipak Dwivedi – mobile no. 9999044813 and 9999944813)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 37. | Ms. Meera Chopra                          | AGNPC4393B | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 37 (Ms. Meera Chopra – mobile no. 7977821332) and               <ul style="list-style-type: none"> <li>- Entity 39 (Ms. Aahuti Rasik Mistry – mobile no. 9892124579)</li> </ul> </li> <li>• Certain WhatsApp chat details between Entity 28 (Shri Manish Mishra) and Entity 39 (Ms. Aahuti Mistry) (though pertaining to January 2023) indicates how trading in GGENG was discussed between them. Also, there is mention of Meera in such chats. The details of chats are provided in Annexure 16</li> </ul>                                                                                                                                                                                                                |
| 38. | Shri Abhinendra Singh                     | BSUPS4998G | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 38 (Shri Abhinendra Singh – mobile no. 9911250256) with Entity 28 (Shri Manish Mishra – mobile no. 8860691117).</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 39. | Ms. Aahuti Rasik Mistry                   | AKSPM8453F | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 39 (Ms. Aahuti Rasik Mistry – mobile no. 9892124579) with               <ul style="list-style-type: none"> <li>- Entity 30 (Shri Dipak Dwivedi – mobile no. 9999944813)</li> <li>- Entity 28 (Shri Manish Mishra – mobile no. 9276000000 and 8860691117)</li> <li>- Entity 37 (Ms. Meera Chopra – mobile no. 7977821332).</li> </ul> </li> <li>• Certain WhatsApp chat details between Entity 28 (Shri Manish Mishra) and Entity 39 (Ms. Aahuti Mistry) (though pertaining to January 2023) indicates how trading in GGENG was discussed between them. Also, there is mention of Meera in such chats. The details of chats are provided in Annexure 16.</li> </ul>                                                          |
| 40. | M/s Karavan Tradelink OPC Private Limited | AAGCK2880F | <ul style="list-style-type: none"> <li>• Associated entity of Entity 41 (Shri Jatin Manubhai Shah) as his son Shri Daivik Jatin Shah is a Director in this company since January 21, 2022. The KYC / AOF details are provided at Annexure 17.</li> <li>• Calls exchanged between Entity 40 (M/s Karavan Tradelink OPC Private Limited - mobile no. 9925011486) with               <ul style="list-style-type: none"> <li>- Entity 30 (Shri Dipak Dwivedi – mobile no. 9999044813)</li> <li>- Entity 31 (Shri Angad Ishwarlal Rathod – mobile no. 8866859336)</li> <li>- Entity 42 (Shri Kishansinh Mansinh Rajput – mobile no. 9714324302)</li> <li>- Entity 41 (Shri Jatin Shah – mobile no. 9825011486)</li> <li>- Entity 28 (Shri Manish Mishra – mobile no. 8860691117).</li> </ul> </li> </ul> |
| 41. | Shri Jatin Manubhai Shah                  | AEGPS5807M | <ul style="list-style-type: none"> <li>• Calls exchanged between Entity 41 (Shri Jatin Manubhai Shah – mobile no. 9825011486) with               <ul style="list-style-type: none"> <li>- Entity 31 (Shri Angad Ishwarlal Rathod – mobile no. 8866859336)</li> <li>- Entity 30 (Shri Dipak Dwivedi – mobile no. 9999044813 and 9999944813)</li> <li>- Entity 40 (M/s Karavan Tradelink OPC Pvt. Ltd. – mobile no. 9925011486)</li> <li>- Entity 42 (Shri Kishansinh Mansinh Rajput – mobile no. 9714324302)</li> <li>- Entity 28 (Shri Manish Mishra - mobile no. 8860691117 and 9276000000)</li> </ul> </li> </ul>                                                                                                                                                                                 |

|     |                                |            |                                                                                                                                                                                                                                                                                                                                                               |
|-----|--------------------------------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                |            | <ul style="list-style-type: none"> <li>Certain WhatsApp chat details between Entity 28 (Shri Manish Mishra) and Entity 41 (Shri Jatin Shah) indicates how trading in GGENG was intricately discussed between them around the time of video upload. The details of chats are provided in Annexure 18.</li> </ul>                                               |
| 42. | Shri Kishansinh Mansinh Rajput | BSFPR0253J | <ul style="list-style-type: none"> <li>Calls exchanged between Entity 42 (Shri Kishansinh Mansinh Rajput – mobile no. 9714324302) with               <ul style="list-style-type: none"> <li>- Entity 41 (Shri Jatin Shah – mobile no. 9825011486)</li> <li>- Entity 40 (Karavan Tradelink OPC Private Limited – mobile no. 9925011486)</li> </ul> </li> </ul> |
| 43. | Ms. Apoorva Agarwal            | AMUPA5282G | <ul style="list-style-type: none"> <li>Calls exchanged between Entity 43 (Apoorva Agarwal - mobile no. 8800667972) with               <ul style="list-style-type: none"> <li>- Entity 29 (Ms. Anshu Mishra - mobile no. 7300634572)</li> <li>- Entity 35 (Ms. Swati Agarwal – mobile no. 7505926357).</li> </ul> </li> </ul>                                  |

39. Certain entities like M/s Wessel Consultancy Pvt. Ltd., Seema Garg, Sharad Premprakash Rathi, Vishesh Gupta may not be in top 25 net sellers list as can be seen in below paragraphs but have been included by virtue of their close relationship with top net sellers or strong connection with other entities in the table above. Wessel Consultancy has squared off the shares of GGENG in Patch 2 but is included in Net Sellers Group by virtue of connection with Net Sellers. Seema Garg, Sharad Premprakash Rathi, Vishesh Gupta have net sold the shares of GGENG in Patch 2.

40. Sunil Bhandari is a strong link between Manish Mishra Group and Net Sellers Group. Shyam HUF has call(s) exchanged with entity from Manish Mishra Group and entity from Net Sellers Group. Sunil Bhandari has traded extensively in the scrip of GGENG on account of his wife Rekha Bhandari. He has also traded in self account. Manish Mishra has traded on behalf of self and his wife Anshu Mishra. Vijay Ghanshyam Pujara, though has net sold the shares, but is part of Manish Mishra Group wherein most of the entities are net buyers. Statements were recorded for certain entities in the matter under Section 11C (5) of SEBI Act, 1992. Extracts of relevant statements important for investigation are provided below:

#### 41. Statement of Shri Manish Mishra (placed at Annexure 6)

Salient points of his statement are provided below:

- Since 2017, he worked in Tipson Stock Brokers Ltd. as National Head. He is handling his wife's business since 2020. He used to give stock recommendation at CNBC, ZEE. He also handles Laddu Gopal Venture which is a film producing company of his wife, Mist Music Production for recording music, Kor Beauty Cosmetics Pvt Ltd. Shareholding in these companies is in his wife's name (she is a 100% shareholder) in these companies.
- YouTube channels that he runs are Money wise, Advisor, Mist Music, Profit Yatra, Midcap Calls. He doesn't remember whether these channels are still being used.

- The email ID manishmishra241083@gmail.com and mobile no. 8860691117 belongs to him.
- He met Shri Sunil Bhandari in 2022. He met Shri Sunil Bhandari 2-3 times but doesn't recall the purpose of meeting him.
- He doesn't recall the purpose of discussions with Shri Sunil Bhandari around December 4, 2022. He doesn't recall having any financial transactions with Shri Sunil Bhandari.
- Shri Nilesh Jagetiya and Shri Purav Patel are his good friends and they have no role to play in uploading the YouTube videos.
- Ms. Ahuti Mistry is the manager of Shri Arshad Warsi and Shri Arshad Warsi was one of the actors in his film. Ms. Ahuti Mistry is the manager of many other actors. Shri Angad Rathod is the employee of Shri Jatin Shah who is his subbroker (broker is MNM). Shri Angad was also his employee in Tipsons. Shri Dipak Dwivedi is his cousin and works in his wife's firm. Shri Dipak is director in many of his companies.
- His wife does not have any role to play. All the transactions related to her including trading were done by him.
- He has traded in the scrip of GGENG in his account as well as his wife's account. Because this trade was done almost 18 months back, he doesn't remember the exact reason why he chose to trade in GGENG scrip. He incurred loss of around Rs. 50,000/- in his account.
- He doesn't have any contact with promoters / directors / employee of GGENG. He did not have any contact with them earlier also.
- He doesn't have any information of the supposed tender or event related to GGENG mentioned in the YouTube video regarding West Bengal Govt.
- He did not have any financial or cash transactions with GGENG, its promoters, KMPs or Directors.

**42. Statement of Shri Sunil Bhandari (placed at Annexure 15)**

Sunil Bhandari indicated the modus operandi adopted during the video patch while trading in the scrip of GGENG. The details of his statement including premeditated arrangement and role of Manish Mishra and himself in helping certain investors offload shares of GGENG is provided below:

- He is a full-fledged trader since 2011 and in stock market since 1991. He has current trading account in Indira securities Limited, Zerodha and ISF Securities. He is authorized person to trade in wife's trading account.
- They are a set of investors and CAs who invest in pre-IPO deals or structured deals with promoters of various companies. He arranges funding / facilitate funding for companies. He works for some commissions.
- As regards details of his present and past directorship and names of companies, Shrestha Finvest Ltd is an NBFC and Investment Company which is actively involved in the securities market. Sunstar Realty Development Limited is in Real Estate business. His wife does not have any directorship in any company. He has directorship of above companies since last 2-3 years. His DIN is- 03120545.
- He does not operate any YouTube Channel. He has no idea about the video with respect to GGENG but has watched one such videos with respect to GGENG. Manish Mishra informed him that he creates the content and upload the videos on his YouTube channels.
- Modus Operandi involved in the matter of GGENG as explained at the time of statement recording is provided below (in verbatim) –

*"the deal was struck where Manish Mishra will facilitate the sale / offload the shares and create liquidity in the scrip of GG Engineering Ltd. as there was not much liquidity in the scrip of GG.*

*As a pre-condition of the deal between Manish Mishra and myself, I was supposed to create the depth by placing the buy orders in the morning as per the instructions of Mr. Manish Mishra....*

*Myself and Mr. Manish Mishra were to help offload the shares of investors...*

*I and Manish Mishra in our own trading account as well as our wives' trading account created depth and volume which helped to provide the exit and offload the shares to the market where video promotions played a significant role.*

*Since the offloaders wanted an exit that too at a high price but as the price rise did not happen, the said deal broke..."*

- He did not get any monetary incentives or payments from Shri Manish Mishra as deal did not materialise. On the pattern of GGENG, he has worked for scrips Sumedha Fiscal Services Ltd and Sylph Technologies Ltd. and Manish Mishra was also part of this modus operandi. In Sumedha, he purchased at Rs. 100 and had to sell at Rs. 50 as Shri Manish Mishra could not help increase the price. In Sumedha, CA group could not liquidate their holdings hence this group approached him. There is cartel of Manish Mishra who used to facilitate the offload. Manish Mishra, Purav Patel, Nilesh Jagetiya is the part

of that cartel. They have facilitated such offload at least in 100 companies. In some companies they have manipulated the price from Rs. 5 to 100 Rs. In GGENG, deal did not materialize and Manish Mishra could not increase the price of GGENG. The content of the videos created by Manish Mishra is generally like company is getting big order, or merger or signed big deal and price will go high.

- He has not received any payments from the directors / promoters / key management personnels for promoting / creating / uploading the videos on YouTube regarding the scrip of GGENG. He has not received any financial benefits or compensation from third parties related to your trading activities in scrip of GGENG. He does not have any bank transaction or cash transaction / connection with GGENG or its promoters, KMPs or Directors.
- He knows Vikas Garg who is the promotor of Vikas Lifecare Ltd. Vikas Garg is part of his social group. Rajan Gupta is broker and financier working in Prassar commodities. The purpose of exchanging calls between himself and Shri Manish Mishra was to get the details of order placement as part of the deal. He traded in the scrip of GGENG in his own account and his wife's account as part of the deal.

**43. Statement of Shri Rajan Gupta (placed at Annexure 13)**

Salient points of his statement are provided below:

- He is a Director in Wessel Consultancy Pvt. Ltd. along with another Director namely Shri Nitin Batri. He owns this company. He is the authorized signatory of Wessel for all bank accounts / trading accounts etc. He takes trading decisions on behalf of Wessel.
- He does not have any personal or business relations with any director / promoter / Key Managerial Personnel of GGENG.
- He knows Sunil Bhandari since last 3 years. He meets Sunil Bhandari in various social events. He does not have any business relationship with him. However, his company Wessel has entered into certain financial transactions with Sunil Bhandari's 2 firms namely Sunstar Realty and Srestha Finvest. He requires these funds because of margin requirements for trading in the securities market. He met Sunil Bhandari through advocate Mukesh Mohan Goyal.
- He knows Shri Vivek Garg both professionally and personally and that Vikas Lifecare Ltd. and Vrindaa Advance Capital Ltd. are companies of Shri Vivek Garg.
- He trades in penny stock and does not have particular rationale for trading in GGENG. He did not make profits in GGENG in year 2022 and hence, continued his trading in 2023 to earn profits.

- He has not entered into any agreement with Srestha / Sunstar / Vivek Garg / Vrindaa Advanced Capital for crores of financial transactions entered into with them. He undertakes financial help from a lot of entities for margin requirements.
- He places orders to get the best rates. He agrees that in the scrip of GGENG the deletions of the orders placed may be high. In normal market segment, he places orders in the disclosed quantity format. He was also trying to control the price of the scrip of GGENG through such premarket orders in large quantities.
- He doesn't trade in penny stock including GGENG based on fundamentals / technical analysis. The primary motive to trade in such penny stock is to get the benefit of 25 / 50 % price increase. He started trading in the scrip from 2022. Similarly, he has traded in Suzlon, R Power and other penny stocks.

**The patch-wise analysis during the IP is as follows:**

**PATCH-1 PRE-VIDEO PATCH - SEPTEMBER 19, 2022 TO DECEMBER 4, 2022**

44. During this patch, the price of the scrip opened at Rs.3.08/- on September 19, 2022, reached a high of Rs.3.08/- on September 19, 2022, reached a low of Rs.1.64/- on November 24, 2022 and closed at Rs. 1.77/- on December 02, 2022 with average daily volume of 13,94,964.37 shares and total traded volume of 7,25,38,147 shares in 52 trading days.

**Top 10 Buy Clients and Sell Clients**

45. Top 10 buyers contributed 39.84% to market volume. Multiplier Share Stock Advisors Private Limited was the top buyer with 9.51% contribution to market volume. Top 10 sellers contributed 38.16% to market volume. Multiplier Share Stock Advisors Private Limited was the top seller with 12.76% contribution to market volume. The details of top 10 buy clients and sell clients during Patch-1 is given below:

| PAN        | Buy Client                                      | Traded Qty | %TQ   | PAN        | Sell Client                                    | Traded Qty | %TQ    |
|------------|-------------------------------------------------|------------|-------|------------|------------------------------------------------|------------|--------|
| AADCM6646A | Multiplier Share Stock Advisors Private Limited | 6897675    | 9.51% | AADCM6646A | Multipler Share Stock Advisors Private Limited | 9256143    | 12.76% |
| AEEPG8794H | Rajan Gupta                                     | 5250000    | 7.24% | AEEPG8794H | Rajan Gupta                                    | 4461461    | 6.15%  |
| AAACQ0004H | Advik Capital Limited                           | 3450637    | 4.76% | AADCM6645D | Mansi Share Stock Advisors Private Limited     | 2500000    | 3.45%  |
| AAFCS1539J | Skse Securities Limited Corp Cmtm Prop Ac       | 2714658    | 3.74% | APUPS9951D | Chetan Rasiklal Shah                           | 2078615    | 2.87%  |
| AADCM6645D | Mansi Share Stock Advisors Private Limited      | 2500000    | 3.45% | BHCPJ6082M | Pinki Jindal                                   | 1980000    | 2.73%  |
| APUPS9951D | Chetan Rasiklal Shah                            | 2078615    | 2.87% | AANFT0325L | Tejas Tradein Lip                              | 1801487    | 2.48%  |
| AANFT0325L | Tejas Tradein Lip                               | 1800000    | 2.48% | AAFCS1539J | Skse Securities Limited Corp Cmtm Prop Ac      | 1635333    | 2.25%  |
| AAECT0741J | Topgain Finance Private Limited                 | 1586512    | 2.19% | AAECT0741J | Topgain Finance Private Limited                | 1587999    | 2.19%  |
| AAGCN6675H | Navratri Share Trading Private Limited .        | 1367739    | 1.89% | AGPPM1886M | Manoj Gupta                                    | 1329995    | 1.83%  |

|                     |                                     |                 |                |                     |                    |                 |                |
|---------------------|-------------------------------------|-----------------|----------------|---------------------|--------------------|-----------------|----------------|
| AACCP8410G          | Pace Stock Broking Services Pvt Ltd | 1250000         | 1.72%          | ACYPR1415Q          | Charu Sharad Rathi | 1051625         | 1.45%          |
| <b>Total</b>        |                                     | <b>28895836</b> | <b>39.84%</b>  | <b>Total</b>        |                    | <b>27682658</b> | <b>38.16%</b>  |
| <b>Market Total</b> |                                     | <b>72538147</b> | <b>100.00%</b> | <b>Market Total</b> |                    | <b>72538147</b> | <b>100.00%</b> |

### Trading by Suspected entities

46. The total traded volume during the period was 7,25,38,147 shares. Out of the 43 suspected entities, 12 entities traded during this period. Out of the 12 entities, 4 entities have net sold the shares. Cumulatively, these 4 entities have sold 21,40,448 shares on net basis which is 2.95 % of total volume traded during the period. Other 8 entities have net bought the shares during this period. Cumulatively, these 8 entities have bought 62,44,374 shares which is 8.61% of volume traded during the period. As buyer, suspected entities cumulatively contributed 18.16% to buy volume and as seller, suspected entities cumulatively contributed 12.5% to sell volume. Suspected entities contributed 2.87% to market volume through trades among group. Trades of the suspected entities during Patch 1 are tabulated below:

| Client name                                    | Buy Traded Qty     | %Buy TQ        | Sell Traded Qty    | %Sell TQ       |
|------------------------------------------------|--------------------|----------------|--------------------|----------------|
| Rajan Gupta                                    | 5250000            | 7.24%          | 4461461            | 6.15%          |
| Advik Capital Limited                          | 3450637            | 4.76%          | 365000             | 0.50%          |
| SKSE Securities Limited Corp Cmtm Prop Ac      | 2714658            | 3.74%          | 1635333            | 2.25%          |
| Jayantilal Babulal Ranka                       | 492223             | 0.68%          | 96500              | 0.13%          |
| Vijay Ghanshyambhai Pujara                     | 329000             | 0.45%          | 0                  | 0.00%          |
| Vishesh Gupta                                  | 307930             | 0.42%          | 0                  | 0.00%          |
| Vikas Garg                                     | 279975             | 0.39%          | 100000             | 0.14%          |
| Blue Square Corporate Services Private Limited | 232247             | 0.32%          | 1000000            | 1.38%          |
| Manish Mishra                                  | 78245              | 0.11%          | 0                  | 0.00%          |
| Charu Sharad Rathi                             | 35120              | 0.05%          | 1051625            | 1.45%          |
| Sharad Premprakash Rathi                       | 0                  | 0.00%          | 200000             | 0.28%          |
| Rekha Bhandari                                 | 0                  | 0.00%          | 156190             | 0.22%          |
| <b>Total</b>                                   | <b>1,31,70,035</b> | <b>18.16%</b>  | <b>90,66,109</b>   | <b>12.50%</b>  |
| <b>Market total</b>                            | <b>7,25,38,147</b> | <b>100.00%</b> | <b>7,25,38,147</b> | <b>100.00%</b> |

### PATCH-2 VIDEO PATCH - DECEMBER 5, 2022 TO DECEMBER 12, 2022

47. From the response of the Google, it is observed that the misleading YouTube videos were uploaded on December 04, 2022 and post uploading of the said videos, volumes in the scrip of GGENG increased significantly till December 12, 2022. Hence, the period from December 05, 2022 to December 12, 2022 (6 trading days) was considered for analysis. During this patch, the price of the scrip opened at Rs.1.85/- on December 05, 2022, reached a high of Rs.2.01/- on December 07, 2022, reached a low of Rs.1.75/- on December 12, 2022 and closed at Rs.1.75/- on December 12, 2022 with average daily volume of 2,80,82,251.83 shares and total volume of 16,84,93,511 shares in 6 trading days.

### Top 10 Buy Clients and Sell Clients

48. Top 10 buyers contributed 40.23% to market volume. Multiplier Share Stock Advisors Private Limited was the top buyer with 10.80% contribution to market volume. Top 10 sellers contributed 46.08% to the market volume. Multiplier Share Stock Advisors Private Limited was the top seller with 6.91% contribution to the market volume. The details of top 10 buy and sell clients are provided below:

| PAN          | BUY CLIENT                                      | TQ           | % TO MKT | PAN          | SELL CLIENT                                     | TQ           | % TO MKT |
|--------------|-------------------------------------------------|--------------|----------|--------------|-------------------------------------------------|--------------|----------|
| AADCM6646A   | Multiplier Share Stock Advisors Private Limited | 1,82,00,679  | 10.80 %  | AADCM6646A   | Multiplier Share Stock Advisors Private Limited | 1,16,45,736  | 6.91%    |
| ALHPB9175D   | Rekha Bhandari                                  | 96,64,269    | 5.74%    | AAECP4144R   | Vrindaa Advanced Materials Limited              | 1,06,50,000  | 6.32%    |
| AMPPM6823L   | Manish Mishra                                   | 82,55,522    | 4.90%    | AEEPG8794H   | Rajan Gupta                                     | 1,06,25,167  | 6.31%    |
| AEEPG8794H   | Rajan Gupta                                     | 69,98,501    | 4.15%    | ALHPB9175D   | Rekha Bhandari                                  | 96,64,269    | 5.74%    |
| AABCV8287E   | Vibrant Securities Private Limited              | 58,20,213    | 3.45%    | AMPPM6823L   | Manish Mishra                                   | 79,33,767    | 4.71%    |
| APUPS9951D   | Chetan Rasiklal Shah                            | 56,00,918    | 3.32%    | AADCA5571A   | Vikas Lifecare Limited                          | 61,46,361    | 3.65%    |
| CIUPR1814B   | Angad Ishwarlal Rathod                          | 46,00,000    | 2.73%    | AABCV8287E   | Vibrant Securities Private Limited              | 58,20,213    | 3.45%    |
| AAECP4144R   | Vrindaa Advanced Materials Limited              | 32,50,000    | 1.93%    | AAACQ0004H   | Advik Capital Limited                           | 57,51,443    | 3.41%    |
| AAACQ0004H   | Advik Capital Limited                           | 30,00,000    | 1.78%    | APUPS9951D   | Chetan Rasiklal Shah                            | 55,75,918    | 3.31%    |
| ATYPM1144L   | Darshan Jaysukhlal Mehta                        | 24,00,057    | 1.42%    | CIUPR1814B   | Angad Ishwarlal Rathod                          | 38,20,900    | 2.27%    |
| Total        |                                                 | 6,77,90,159  | 40.23 %  | Total        |                                                 | 7,76,33,774  | 46.08 %  |
| Market Total |                                                 | 16,84,93,511 | 100.00 % | Market Total |                                                 | 16,84,93,511 | 100.00 % |

### Trading by Suspected entities

49. The total traded volume during the period was 16,84,93,511. Out of the 43 entities, 27 entities have net sold, 3 entities have squared off and 13 entities have net bought the shares during this period. 27 entities have sold 4,85,75,761 shares on net basis which is 28.82% of total volume traded during the period. 13 entities have net bought 86,50,965 shares which is 5.13% of total volume traded during the period. As buyer, suspected entities contributed 29.5% to total traded volume and as seller, suspected entities contributed 53.2% to sell volume. Suspected entities contributed 10.09% to market volume by trading among themselves. Trades of these suspected entities are tabulated below:

| PAN        | ENTITY NAME                    | BUY TQ  | % TO MKT | SELL TQ  | % TO MKT | Net Sold |
|------------|--------------------------------|---------|----------|----------|----------|----------|
| AAECP4144R | Vrindaa Advanced Materials Ltd | 3250000 | 1.93     | 10650000 | 6.32     | 7400000  |
| AADCA5571A | Vikas Lifecare Ltd             | 1233666 | 0.73     | 6146361  | 3.65     | 4912695  |
| AEEPG8794H | Rajan Gupta                    | 6998501 | 4.15     | 10625167 | 6.31     | 3626666  |
| AAOPJ0181H | Namita Garg                    | 0       | -        | 3529638  | 2.09     | 3529638  |
| AQQPG5523N | Vinayak Garg                   | 0       | -        | 3400000  | 2.02     | 3400000  |

|                     |                                           |           |      |           |      |          |
|---------------------|-------------------------------------------|-----------|------|-----------|------|----------|
| AAACQ0004H          | Advik Capital Ltd                         | 3000000   | 1.78 | 5751443   | 3.41 | 2751443  |
| AADCB4038M          | Blue Square Corporate Services Pvt Ltd    | 0         | -    | 1732247   | 1.03 | 1732247  |
| AAWCS8320E          | Just Right Life Ltd                       | 1534249   | 0.91 | 3150000   | 1.87 | 1615751  |
| ABAHS7715R          | Shyam HUF                                 | 0         | 0    | 1600000   | 0.95 | 1600000  |
| ABJPK5857F          | Naresh Aggarwal                           | 0         | 0    | 1560000   | 0.93 | 1560000  |
| AGXPP5209R          | Vijay Ghanshyambhai Pujara                | 0         | 0    | 1501130   | 0.89 | 1501130  |
| AEWPK0416L          | Krishan Kumar                             | 0         | 0    | 1500000   | 0.89 | 1500000  |
| ASKPB4999D          | Urvashi Mittal                            | 0         | 0    | 1500000   | 0.89 | 1500000  |
| ACYPR1415Q          | Charu Sharad Rathi                        | 0         | 0    | 1483495   | 0.88 | 1483495  |
| AGBPM3239N          | Priya Mittal                              | 0         | 0    | 1388500   | 0.82 | 1388500  |
| ABIPB2288G          | Sharad Kumar Bagga                        | 0         | 0    | 1100000   | 0.65 | 1100000  |
| AAFCS1539J          | SKSE Securities Limited Corp Cmtm Prop Ac | 130000    | 0.08 | 1209000   | 0.72 | 1079000  |
| AAZPA7513M          | Nirmal Aggarwal                           | 0         | 0    | 1060696   | 0.63 | 1060696  |
| CGPPM9221A          | Sonakshi Mittal                           | 0         | 0    | 1000000   | 0.59 | 1000000  |
| AAFPB3424Q          | Sandeep Bansal                            | 0         | 0    | 1000000   | 0.59 | 1000000  |
| ABVPA5466G          | Govind Aggarwal                           | 0         | 0    | 1000000   | 0.59 | 1000000  |
| AFHPM9429D          | Naresh Mittal                             | 0         | 0    | 820000    | 0.49 | 820000   |
| AAAPG8241P          | Vikas Garg                                | 558149    | 0.33 | 1258149   | 0.75 | 700000   |
| AABPR8238C          | Jayantilal Babulal Ranka                  | 11000     | 0.01 | 535500    | 0.32 | 524500   |
| AAJPG3268R          | Seema Garg                                | 1000000   | 0.59 | 1340000   | 0.8  | 340000   |
| AIAPG4936H          | Vishesh Gupta                             | 0         | 0    | 300000    | 0.18 | 300000   |
| AAFRP3291K          | Sharad Premprakash Rathi                  | 0         | 0    | 150000    | 0.09 | 150000   |
| ALHPB9175D          | Rekha Bhandari                            | 9664269   | 5.74 | 9664269   | 5.74 | 0        |
| ALZPB5747M          | Sunil Bhandari                            | 229323    | 0.14 | 229323    | 0.14 | 0        |
| AABCW7779E          | Wessel Consultancy Pvt Ltd                | 150446    | 0.09 | 150446    | 0.09 | 0        |
| AAGCK2880F          | Karavan Tradelink Opc Pvt Ltd Vate        | 974958    | 0.58 | 950000    | 0.56 | -24958   |
| BSFPR0253J          | Kishansinh Mansinh Rajput                 | 192165    | 0.11 | 0         | 0    | -192165  |
| AGNPC4393B          | Meera Chopra                              | 270000    | 0.16 | 0         | 0    | -270000  |
| IYAPS6653F          | Vertika Singh                             | 300000    | 0.18 | 0         | 0    | -300000  |
| AMPPM6823L          | Manish Mishra                             | 8255522   | 4.9  | 7933767   | 4.71 | -321755  |
| AMUPA5282G          | Apoorva Agarwal                           | 329500    | 0.2  | 0         | 0    | -329500  |
| AEGPS5807M          | Jatin Manubhai Shah                       | 400000    | 0.24 | 41513     | 0.02 | -358487  |
| BSUPS4998G          | Abhinendra Singh                          | 745000    | 0.44 | 0         | -    | -745000  |
| CIUPR1814B          | Angad Ishwarlal Rathod                    | 4600000   | 2.73 | 3820900   | 2.27 | -779100  |
| BMIPS3480H          | Anshu Mishra                              | 1300000   | 0.77 | 500000    | 0.3  | -800000  |
| AKSPM8453F          | Aahuti Rasik Mistry                       | 1350000   | 0.8  | 0         | 0    | -1350000 |
| ATDPD4055C          | Dipak Dwiwedi                             | 1531640   | 0.91 | 31640     | 0.02 | -1500000 |
| AHSPA6945R          | Swati Agarwal                             | 1680000   | 1    | 0         | 0    | -1680000 |
| <b>Total</b>        |                                           | 49688388  | 29.5 | 89613184  | 53.2 | 39924796 |
| <b>Market Total</b> |                                           | 168493511 | 100  | 168493511 | 100  |          |

### Suspect entities - reversal trades

50. Suspect entities did reversal trades among themselves on 3 days and contributed 0.84% to market volume. Details of reversal trades among suspected entities during the IP are given below:

| PAN        | Buyer Name                        | Cp PAN     | Seller Name    | Gross Buy | Gross Sell | Reversal Qty | Number Of Days | %Market volume |
|------------|-----------------------------------|------------|----------------|-----------|------------|--------------|----------------|----------------|
| AAECP4144R | Vrinda Advanced Materials Limited | ALHPB9175D | Rekha Bhandari | 302513    | 641039     | 605026       | 1              | 0.36%          |
| AEEPG8794H | Rajan Gupta                       | ALHPB9175D | Rekha Bhandari | 250000    | 125693     | 251386       | 1              | 0.15%          |
| AEEPG8794H | Rajan Gupta                       | AMPPM6823L | Manish Mishra  | 277964    | 499600     | 555928       | 1              | 0.33%          |
| Total      |                                   |            |                | 830477    | 1266332    | 1412340      | 3              | 0.84%          |

### Top 25 Net Sellers Analysis

51. During this period, the traded volume was 16,84,93,511 and 11,862 total unique clients traded. Out of 11,862 entities traded, 584 entities net sold the shares. These 584 entities have altogether net sold 5,90,52,493 shares out of which top 25 net sellers sold 4,87,85,761 shares during this period i.e. top 25 entities have contributed to 82.61% of net sold volume by these 584 entities.

52. Out of the 25 net sellers, 24 entities are part of suspected entities' list. These 24 suspected entities net sold 4,77,85,761 shares and have contributed to 80.92 % of total net sold volume contributed by 584 entities. Out of these 24 entities, 19 entities were allotted shares in the rights issue of GGENG. Hence, it is alleged that there is a clear pattern of shares being sold by the connected / related entities post the circulation of false and misleading information about the scrip of GGENG through YouTube videos.

| PAN        | Client Name                                    | Buy Qty   | Sell Qty    | Net Sold Qty | RE allottees | Qty Allotted |
|------------|------------------------------------------------|-----------|-------------|--------------|--------------|--------------|
| AAECP4144R | Vrinda Advanced Materials Limited              | 32,50,000 | 1,06,50,000 | 74,00,000    | Yes          | 2,75,57,742  |
| AADCA5571A | Vikas Lifecare Limited                         | 12,33,666 | 61,46,361   | 49,12,695    | Yes          | 1,65,00,000  |
| AEEPG8794H | Rajan Gupta                                    | 69,98,501 | 1,06,25,167 | 36,26,666    | -            | -            |
| AAOPJ0181H | Namita Garg                                    | -         | 35,29,638   | 35,29,638    | Yes          | 39,00,000    |
| AQQPG5523N | Vinayak Garg                                   | -         | 34,00,000   | 34,00,000    | Yes          | 39,00,000    |
| AAACQ0004H | Advik Capital Limited                          | 30,00,000 | 57,51,443   | 27,51,443    | Yes          | 1,00,00,000  |
| AADCB4038M | Blue Square Corporate Services Private Limited | -         | 17,32,247   | 17,32,247    | Yes          | 25,00,000    |
| AAWCS8320E | Just Right Life Limited                        | 15,34,249 | 31,50,000   | 16,15,751    | -            | -            |
| ABAHS7715R | Shyam HUF                                      | -         | 16,00,000   | 16,00,000    | Yes          | 30,50,000    |
| ABJPK5857F | Nareish Aggarwal                               | -         | 15,60,000   | 15,60,000    | Yes          | 20,00,000    |
| AGXPP5209R | Vijay Ghanshyambhai Pujara                     | -         | 15,01,130   | 15,01,130    | -            | -            |
| AEWPK0416L | Krishan Kumar                                  | -         | 15,00,000   | 15,00,000    | Yes          | 20,00,000    |
| ASKPB4999D | Urvashi Mittal                                 | -         | 15,00,000   | 15,00,000    | Yes          | 20,00,000    |

|            |                                           |             |             |             |     |             |
|------------|-------------------------------------------|-------------|-------------|-------------|-----|-------------|
| ACYPR1415Q | Charu Sharad Rathi                        | -           | 14,83,495   | 14,83,495   | Yes | 25,00,000   |
| AGBPM3239N | Priya Mittal                              | -           | 13,88,500   | 13,88,500   | Yes | 13,88,500   |
| ABIPB2288G | Sharad Kumar Bagga                        | -           | 11,00,000   | 11,00,000   | Yes | 11,00,000   |
| AAFCS1539J | SKSE Securities Limited Corp Cmtm Prop Ac | 1,30,000    | 12,09,000   | 10,79,000   | -   | -           |
| AAZPA7513M | Nirmal Aggarwal                           | -           | 10,60,696   | 10,60,696   | Yes | 20,00,000   |
| CGPPM9221A | Sonakshi Mittal                           | -           | 10,00,000   | 10,00,000   | Yes | 20,00,000   |
| AAFPB3424Q | Sandeep Bansal                            | -           | 10,00,000   | 10,00,000   | Yes | 13,34,000   |
| ABVPA5466G | Govind Aggarwal                           | -           | 10,00,000   | 10,00,000   | Yes | 20,00,000   |
| AFHPM9429D | Naresh Mittal                             | -           | 8,20,000    | 8,20,000    | Yes | 13,88,500   |
| AAAPG8241P | Vikas Garg                                | 5,58,149    | 12,58,149   | 7,00,000    | -   | -           |
| AABPR8238C | Jayantilal Babulal Ranka                  | 11,000      | 5,35,500    | 5,24,500    | Yes | 2,00,000    |
|            |                                           |             |             |             |     |             |
|            | Total                                     | 1,67,15,565 | 6,45,01,326 | 4,77,85,761 |     | 8,73,18,742 |

### Net Buyer Analysis

53. While analyzing the net buyers during the period, it was observed that there were 9,933 entities, which have net bought the shares. These 9,933 entities have altogether bought 5,90,52,493 shares on net basis. Out of these 9,933, 311 entities have net bought more than or equal to 25,000 shares and 9,622 entities have net bought shares less than 25,000 shares.

54. Further on analyzing 311 entities (who have net bought more than or equal to 25,000 shares), it was observed that 13 entities which are connected to Manish Mishra Group have altogether bought 86,50,965 shares on net basis, which is 14.65% of net buy quantity during the period. These 13 entities (except Karavan Tradelink OPC Private Limited) are amongst top 35 net buyers during this period. Further, these 13 net buyers have bought 2,19,28,785 shares on gross basis, which is 13 % of the traded quantity. The shares traded by these 13 entities during this period is tabulated below:

| PAN        | Client Name                   | Buy Qty   | Sell Qty  | Net Buy   | Net Buyer Rank |
|------------|-------------------------------|-----------|-----------|-----------|----------------|
| AHSPA6945R | Swati Agarwal                 | 16,80,000 | -         | 16,80,000 | 3              |
| ATDPD4055C | Dipak Dwiwedi                 | 15,31,640 | 31,640    | 15,00,000 | 4              |
| AKSPM8453F | Aahuti Rasik Mistry           | 13,50,000 | -         | 13,50,000 | 5              |
| BMIPS3480H | Anshu Mishra                  | 13,00,000 | 5,00,000  | 8,00,000  | 10             |
| CIUPR1814B | Angad Ishwarlal Rathod        | 46,00,000 | 38,20,900 | 7,79,100  | 12             |
| BSUPS4998G | Abhinendra Singh              | 7,45,000  | -         | 7,45,000  | 13             |
| AEGPS5807M | Jatin Manubhai Shah           | 4,00,000  | 41,513    | 3,58,487  | 20             |
| AMUPA5282G | Apoorva Agarwal               | 3,29,500  | -         | 3,29,500  | 21             |
| AMPPM6823L | Manish Mishra                 | 82,55,522 | 79,33,767 | 3,21,755  | 22             |
| IYAPS6653F | Vertika Singh                 | 3,00,000  | -         | 3,00,000  | 23             |
| AGNPC4393B | Meera Chopra                  | 2,70,000  | -         | 2,70,000  | 25             |
| BSFPR0253J | Kishansinh Mansinh Rajput     | 1,92,165  | -         | 1,92,165  | 35             |
| AAGCK2880F | Karavan Tradelink OPC Pvt Ltd | 9,74,958  | 9,50,000  | 24,958    | 312            |

|  |  |             |             |           |  |
|--|--|-------------|-------------|-----------|--|
|  |  | 2,19,28,785 | 1,32,77,820 | 86,50,965 |  |
|--|--|-------------|-------------|-----------|--|

### Trading between Net Sellers Group and Manish Mishra Group

55. During Patch 2, entities in the Manish Mishra Group by actively participating in the buy trades, contributed significantly to buy volume and has provided exit to the Net Sellers Group as brought out below:

| Entity - Net Sellers Group                     | Sell_Qty    | Net Sold  | Buyers Name - Manish Mishra Group | Qty Bought | % Contribution By Buyer To Sell_Qty |
|------------------------------------------------|-------------|-----------|-----------------------------------|------------|-------------------------------------|
| Vrinda Advanced Materials Limited              | 1,06,50,000 | 74,00,000 | Rekha Bhandari                    | 13,88,030  | 13%                                 |
|                                                |             |           | Vertika Singh                     | 18,050     | 0.17%                               |
|                                                |             |           | Abhinendra Singh                  | 17,834     | 0.17%                               |
| Vikas Lifecare Limited                         | 61,48,361   | 49,12,695 | Aahuti Rasik Mistry               | 3,06,985   | 4.99%                               |
|                                                |             |           | Rekha Bhandari                    | 97,055     | 1.58%                               |
| Rajan Gupta                                    | 1,06,25,167 | 36,26,666 | Manish Mishra                     | 4,99,600   | 4.70%                               |
|                                                |             |           | Angad Ishwarlal Rathod            | 2,89,246   | 2.72%                               |
|                                                |             |           | Rekha Bhandari                    | 1,25,693   | 1.18%                               |
|                                                |             |           | Meera Chopra                      | 1,13,874   | 1.07%                               |
|                                                |             |           | Abhinendra Singh                  | 74,053     | 0.70%                               |
|                                                |             |           | Aahuti Rasik Mistry               | 26,507     | 0.25%                               |
| Namita Garg                                    | 35,29,638   | 35,29,638 | Rekha Bhandari                    | 9,48,685   | 26.88%                              |
|                                                |             |           | Manish Mishra                     | 2,78,657   | 7.89%                               |
|                                                |             |           | Abhinendra Singh                  | 15,166     | 0.43%                               |
| Vinayak Garg                                   | 34,00,000   | 34,00,000 | Rekha Bhandari                    | 14,16,757  | 41.67%                              |
| Advik Capital Limited                          | 57,51,443   | 27,51,443 | Aahuti Rasik Mistry               | 8,71,924   | 15.16%                              |
|                                                |             |           | Rekha Bhandari                    | 6,16,838   | 10.72%                              |
|                                                |             |           | Apoorva Agarwal                   | 72,435     | 1.26%                               |
|                                                |             |           | Swati Agarwal                     | 47,213     | 0.82%                               |
| Blue Square Corporate Services Private Limited | 17,32,247   | 17,32,247 | Manish Mishra                     | 2,51,085   | 14.49%                              |
|                                                |             |           | Rekha Bhandari                    | 2,49,631   | 14.41%                              |
|                                                |             |           | Angad Ishwarlal Rathod            | 48,915     | 2.82%                               |
| Just Right Life Limited                        | 31,50,000   | 16,15,751 | #N/A                              | #N/A       | #N/A                                |
| Naresh Aggarwal                                | 15,60,000   | 15,60,000 | Swati Agarwal                     | 1,03,825   | 6.66%                               |
|                                                |             |           | Abhinendra Singh                  | 71,652     | 4.59%                               |
|                                                |             |           | Manish Mishra                     | 15,713     | 1.01%                               |
| Krishan Kumar                                  | 15,00,000   | 15,00,000 | Swati Agarwal                     | 3,21,782   | 21.45%                              |
|                                                |             |           | Abhinendra Singh                  | 61,135     | 4.08%                               |
|                                                |             |           | Apoorva Agarwal                   | 10,900     | 0.73%                               |
| Urvashi Mittal                                 | 15,00,000   | 15,00,000 | Abhinendra Singh                  | 62,358     | 4.16%                               |
|                                                |             |           | Swati Agarwal                     | 45,000     | 3.00%                               |
| Charu Sharad Rathi                             | 14,83,495   | 14,83,495 | Rekha Bhandari                    | 3,50,000   | 23.59%                              |

|                                           |              |             |                        |             |         |
|-------------------------------------------|--------------|-------------|------------------------|-------------|---------|
|                                           |              |             | Angad Ishwarlal Rathod | 3,00,000    | 20.22%  |
| Priya Mittal                              | 13,88,500    | 13,88,500   | Abhinendra Singh       | 81,577      | 5.88%   |
| Sharad Kumar Bagga                        | 11,00,000    | 11,00,000   | Abhinendra Singh       | 1,26,954    | 11.54%  |
| Skse Securities Limited Corp Cmtm Prop Ac | 12,09,000    | 10,79,000   | #N/A                   | #N/A        | #N/A    |
| Nirmal Aggarwal                           | 10,60,696    | 10,60,696   | #N/A                   | #N/A        | #N/A    |
| Sonakshi Mittal                           | 10,00,000    | 10,00,000   | Meera Chopra           | 1,06,126    | 10.61%  |
| Sandeep Bansal                            | 10,00,000    | 10,00,000   | Rekha Bhandari         | 4,98,427    | 49.84%  |
| Govind Aggarwal                           | 10,00,000    | 10,00,000   | Meera Chopra           | 50,000      | 5.00%   |
| Naresh Mittal                             | 8,20,000     | 8,20,000    | #N/A                   | #N/A        | #N/A    |
| Vikas Garg                                | 12,58,149    | 7,00,000    | #N/A                   | #N/A        | #N/A    |
| Jayantilal Babulal Ranka                  | 5,35,500     | 5,24,500    | Rekha Bhandari         | 1,30,181    | 24.31%  |
|                                           |              |             | Manish Mishra          | 5,000       | 0.93%   |
| Seema Garg                                | 13,40,000    | 3,40,000    | Apoorva Agarwal        | 44,500      | 3.32%   |
|                                           |              |             | Swati Agarwal          | 40,000      | 2.99%   |
| Vishesh Gupta                             | 3,00,000     | 3,00,000    | Swati Agarwal          | 29,365      | 9.79%   |
| Sharad Premprakash Rathi                  | 1,50,000     | 1,50,000    | Angad Ishwarlal Rathod | 1,50,000    | 100.00% |
| Wessel Consultancy Pvt. Ltd.*             | 1,50,446     | -           | Manish Mishra          | 1,50,403    | 99.97%  |
| Total                                     | 6,33,40,642  | 4,54,74,631 |                        | 1,05,29,131 | 16.62%  |
| Market                                    | 16,84,93,511 |             |                        |             | 6.25%   |

56. On counter party analysis of the volume of shares sold by the aforesaid Net Sellers Group entities to Manish Mishra Group entities, it is observed that Manish Mishra Group entities cumulatively purchased 1,05,29,131 quantity of shares from Net Sellers Group which is 16.62% of the total volume sold by the Net Sellers and 6.25% of total market volume in Patch 2. Further, the tables 32 & 33 indicate that the buyers (Manish Mishra Group entities) who are contributing to the above net sellers are buying on net basis (except Rekha Bhandari) during Patch 2.

#### Trades between Manish Mishra Group Entities

| Trades amongst Manish Mishra Group Entities | Vijay Ghanshyambhai Pujara | Rekha Bhandari | Angad Ishwarlal Rathod | Sunil Bhandari | Shyam HUF | Total Qty Traded Among Group         |
|---------------------------------------------|----------------------------|----------------|------------------------|----------------|-----------|--------------------------------------|
| Swati Agarwal                               | 2,04,489                   |                |                        |                |           | 2,04,489                             |
| Manish Mishra                               |                            | 5              | 21,71,950              |                |           | 21,71,955                            |
| Anshu Mishra                                |                            | 1,80,000       |                        | 12,007         |           | 1,92,007                             |
| Abhinendra Singh                            |                            |                |                        |                | 23,923    | 23,923                               |
| Total Qty Traded Among Group                | 2,04,489                   | 1,80,005       | 21,71,950              | 12,007         | 23,923    | 25,92,374<br>(1.54 of Market Volume) |

#### Top 10 Buy and Sell Brokers

57. Price of the scrip opened at Rs.1.67/- on December 13, 2022, reached a high of Rs.1.74/- on December 13, 2022, reached a low of Rs.1.35/- on December 30, 2022 and closed at Rs.1.35/- on December 30, 2022.

### Top 10 Gross Buyers and Gross Sellers

58. Top 10 buyers contributed 36.13% to market volume. Just Right Life Limited was the top buyer with 7.95% contribution to market volume. Top 10 sellers contributed 66.48% to market volume. Multiplier Share Stock Advisors Private Limited was the top seller with 33.78% contribution to market volume. The details of top 10 buyers and sellers are given below:

| Pan                 | Client Name                                     | Traded Qty      | %Tq            | Cp Pan              | Client name                                     | Traded Qty      | %Tq            |
|---------------------|-------------------------------------------------|-----------------|----------------|---------------------|-------------------------------------------------|-----------------|----------------|
| AAWCS8320E          | Just Right Life Limited                         | 1651534         | 7.95%          | AADCM6646A          | Multiplier Share Stock Advisors Private Limited | 7018521         | 33.78%         |
| AYVPJ0717C          | Jeby Joseph                                     | 1180000         | 5.68%          | AAECP4144R          | Vrindaa Advanced Materials Limited              | 1444572         | 6.95%          |
| AAECP4144R          | Vrindaa Advanced Materials Limited              | 900000          | 4.33%          | AAIFE6716B          | Epitome Trading And Investments                 | 1300000         | 6.26%          |
| ALHPB9175D          | Rekha Bhandari                                  | 700930          | 3.37%          | CIUPR1814B          | Angad Ishwarlal Rathod                          | 779000          | 3.75%          |
| CJIPS3069N          | Gagandeep Singh Saini                           | 700000          | 3.37%          | ALHPB9175D          | Rekha Bhandari                                  | 700930          | 3.37%          |
| AMPPM6823L          | Manish Mishra                                   | 600000          | 2.89%          | AMPPM6823L          | Manish Mishra                                   | 662920          | 3.19%          |
| AAACM5313R          | Srestha Finvest Limited                         | 472011          | 2.27%          | AADCA5571A          | Vikas Lifecare Limited                          | 576200          | 2.77%          |
| AADCM6646A          | Multiplier Share Stock Advisors Private Limited | 463562          | 2.23%          | ATDPD4055C          | Dipak Dwiwedi                                   | 500000          | 2.41%          |
| AAGCP0592H          | Prashant Equity Management Private Limited      | 450000          | 2.17%          | AAACM5313R          | Srestha Finvest Limited                         | 472011          | 2.27%          |
| AODPB8710P          | Subratabiswas                                   | 388926          | 1.87%          | AEGPS5807M          | Jatin Manubhai Shah                             | 358000          | 1.72%          |
| <b>Total</b>        |                                                 | <b>7506963</b>  | <b>36.13%</b>  | <b>Total</b>        |                                                 | <b>13812154</b> | <b>66.48%</b>  |
| <b>Market Total</b> |                                                 | <b>20776760</b> | <b>100.00%</b> | <b>Market Total</b> |                                                 | <b>20776760</b> | <b>100.00%</b> |

### Trading by suspect entities during Patch 3

59. During this patch, only 11 suspected entities out of 43 suspected entities traded in the scrip of GGENG. 1 suspect entity traded as a net buyer, 1 suspect entity squared off the trades and remaining 9 entities traded as net sellers. Suspected entities contributed 18.54% to buy volume and 26.05% to sell volume. Suspected entities contributed 5.32% to market volume through trades amongst them as a group. The details of their trading are given below:

| Client name                                | Buy Traded Qty  | %Buy tq        | Sell Traded Qty | %Sell tq       |
|--------------------------------------------|-----------------|----------------|-----------------|----------------|
| Just Right Life Limited                    | 1651534         | 7.95%          | 0               | 0.00%          |
| Vrindaa Advanced Materials Limited         | 900000          | 4.33%          | 1444572         | 6.95%          |
| Rekha Bhandari                             | 700930          | 3.37%          | 700930          | 3.37%          |
| Manish Mishra                              | 600000          | 2.89%          | 662920          | 3.19%          |
| Advik Capital Limited                      | 0               | 0.00%          | 174637          | 0.84%          |
| Jatin Manubhai Shah                        | 0               | 0.00%          | 358000          | 1.72%          |
| Vikas Lifecare Limited                     | 0               | 0.00%          | 576200          | 2.77%          |
| Angad Ishwarlal Rathod                     | 0               | 0.00%          | 779000          | 3.75%          |
| Dipak Dwiwedi                              | 0               | 0.00%          | 500000          | 2.41%          |
| Kishansinh Mansinh Rajput                  | 0               | 0.00%          | 192165          | 0.92%          |
| Karavan Tradelink Opc Private Limited Vate | 0               | 0.00%          | 24958           | 0.12%          |
| <b>Total</b>                               | <b>3852464</b>  | <b>18.54%</b>  | <b>5413382</b>  | <b>26.05%</b>  |
| <b>Market total</b>                        | <b>20776760</b> | <b>100.00%</b> | <b>20776760</b> | <b>100.00%</b> |

### TRADING PATTERN OF ALL SUSPECTS DURING IP IN THE SCRIP OF GGENG

60. The trading details of all suspects in the scrip of GGENG across 3 patches is provided in the table below. It is alleged that Manish Mishra Group entities actively traded during December 05-12, 2022. None of the aforesaid group entities (except Manish Mishra, Rekha Bhandari and Vijay Pujara) has traded in the scrip during

September 19, 2022 to December 04, 2022. This can be seen from the trades of Manish Mishra Group tabulated below:

| Entity Name                                    | Sept 16, 2022-Dec 04, 2022 |           |                 | Dec 05, 2022- Dec 12, 2022 |             |                 | Dec 13, 2022-Dec 31, 2022 |           |                 |
|------------------------------------------------|----------------------------|-----------|-----------------|----------------------------|-------------|-----------------|---------------------------|-----------|-----------------|
|                                                | Buy_Qty                    | Sell_Qty  | Net Sold/Bought | Buy_Qty                    | Sell_Qty    | Net Sold/Bought | Buy_Qty                   | Sell_Qty  | Net Sold/Bought |
| Vrinda Advanced Materials Limited              | 0                          | 0         | 0               | 32,50,000                  | 1,06,50,000 | 74,00,000       | 9,00,000                  | 14,44,572 | 5,44,572        |
| Vikas Lifecare Limited                         | 0                          | 0         | 0               | 12,33,666                  | 61,46,361   | 49,12,695       | 0                         | 5,76,200  | 5,76,200        |
| Rajan Gupta                                    | 52,50,000                  | 44,61,461 | -7,88,539       | 69,98,501                  | 1,06,25,167 | 36,26,666       | 0                         | 0         | 0               |
| Namita Garg                                    | 0                          | 0         | 0               | 0                          | 35,29,638   | 35,29,638       | 0                         | 0         | 0               |
| Vinayak Garg                                   | 0                          | 0         | 0               | 0                          | 34,00,000   | 34,00,000       | 0                         | 0         | 0               |
| Advik Capital Limited                          | 34,50,637                  | 3,65,000  | -30,85,637      | 30,00,000                  | 57,51,443   | 27,51,443       | 0                         | 1,74,637  | 1,74,637        |
| Blue Square Corporate Services Private Limited | 2,32,247                   | 10,00,000 | 7,67,753        | 0                          | 17,32,247   | 17,32,247       | 0                         | 0         | 0               |
| Just Right Life Limited                        | 0                          | 0         | 0               | 15,34,249                  | 31,50,000   | 16,15,751       | 16,51,534                 | 0         | 16,51,534       |
| Shyam Huf #                                    | 0                          | 0         | 0               | 0                          | 16,00,000   | 16,00,000       | 0                         | 0         | 0               |
| Naresh Aggarwal                                | 0                          | 0         | 0               | 0                          | 15,60,000   | 15,60,000       | 0                         | 0         | 0               |
| Vijay Ghanshyambhai Pujara #                   | 3,29,000                   | 0         | -3,29,000       | 0                          | 15,01,130   | 15,01,130       | 0                         | 0         | 0               |
| Krishan Kumar                                  | 0                          | 0         | 0               | 0                          | 15,00,000   | 15,00,000       | 0                         | 0         | 0               |
| Urvashi Mittal                                 | 0                          | 0         | 0               | 0                          | 15,00,000   | 15,00,000       | 0                         | 0         | 0               |
| Charu Sharad Rathi                             | 35,120                     | 10,51,625 | 10,16,505       | 0                          | 14,83,495   | 14,83,495       | 0                         | 0         | 0               |
| Priya Mittal                                   | 0                          | 0         | 0               | 0                          | 13,88,500   | 13,88,500       | 0                         | 0         | 0               |
| Sharad Kumar Bagga                             | 0                          | 0         | 0               | 0                          | 11,00,000   | 11,00,000       | 0                         | 0         | 0               |
| Sise Securities Limited Corp Cmtm Prop Ac      | 27,14,658                  | 16,35,333 | -10,79,325      | 1,30,000                   | 12,09,000   | 10,79,000       | 0                         | 0         | 0               |
| Nirmal Aggarwal                                | 0                          | 0         | 0               | 0                          | 10,60,696   | 10,60,696       | 0                         | 0         | 0               |
| Sonakshi Mittal                                | 0                          | 0         | 0               | 0                          | 10,00,000   | 10,00,000       | 0                         | 0         | 0               |
| Sandeep Bansal                                 | 0                          | 0         | 0               | 0                          | 10,00,000   | 10,00,000       | 0                         | 0         | 0               |
| Govind Aggarwal                                | 0                          | 0         | 0               | 0                          | 10,00,000   | 10,00,000       | 0                         | 0         | 0               |
| Naresh Mittal                                  | 0                          | 0         | 0               | 0                          | 8,20,000    | 8,20,000        | 0                         | 0         | 0               |
| Vikas Garg                                     | 2,79,975                   | 1,00,000  | -1,79,975       | 5,58,149                   | 12,58,149   | 7,00,000        | 0                         | 0         | 0               |
| Jayantilal Babulal Ranka                       | 4,92,223                   | 96,500    | -3,95,723       | 11,000                     | 5,35,500    | 5,24,500        | 0                         | 0         | 0               |
| Seema Garg                                     | 0                          | 0         | 0               | 10,00,000                  | 13,40,000   | 3,40,000        | 0                         | 0         | 0               |
| Vishesh Gupta                                  | 3,07,930                   | 0         | -3,07,930       | 0                          | 3,00,000    | 3,00,000        | 0                         | 0         | 0               |
| Sharad Premprakash Rathi                       | 0                          | 2,00,000  | 2,00,000        | 0                          | 1,50,000    | 1,50,000        | 0                         | 0         | 0               |

|                                              |        |          |          |           |           |           |          |          |          |
|----------------------------------------------|--------|----------|----------|-----------|-----------|-----------|----------|----------|----------|
| Rekha Bhandari #                             | 0      | 1,56,190 | 1,56,190 | 96,64,269 | 96,64,269 | 0         | 7,00,930 | 7,00,930 | 0        |
| Sunil Bhandari #                             | 0      | 0        | 0        | 2,29,323  | 2,29,323  | 0         | 0        | 0        | 0        |
| Wessel Consultancy Private Limited           | 0      | 0        | 0        | 1,50,446  | 1,50,446  | 0         | 0        | 0        | 0        |
| Karavan Tradelink Opc Private Limited Vate # | 0      | 0        | 0        | 9,74,958  | 9,50,000  | 24,958    | 0        | 24,958   | 24,958   |
| Kishansinh Mansinh Rajput #                  | 0      | 0        | 0        | 1,92,165  | 0         | 1,92,165  | 0        | 1,92,165 | 1,92,165 |
| Meera Chopra #                               | 0      | 0        | 0        | 2,70,000  | 0         | 2,70,000  | 0        | 0        | 0        |
| Vertika Singh #                              | 0      | 0        | 0        | 3,00,000  | 0         | 3,00,000  | 0        | 0        | 0        |
| Manish Mishra #                              | 78,245 | 0        | -78,245  | 82,55,522 | 79,33,767 | 3,21,755  | 6,00,000 | 6,62,920 | 62,920   |
| Apoorva Agarwal #                            | 0      | 0        | 0        | 3,29,500  | 0         | 3,29,500  | 0        | 0        | 0        |
| Jatin Manubhai Shah#                         | 0      | 0        | 0        | 4,00,000  | 41,513    | 3,58,487  | 0        | 3,58,000 | 3,58,000 |
| Abhinendra Singh #                           | 0      | 0        | 0        | 7,45,000  | 0         | 7,45,000  | 0        | 0        | 0        |
| Angad Ishwarlal Rathod #                     | 0      | 0        | 0        | 46,00,000 | 38,20,900 | 7,79,100  | 0        | 7,79,000 | 7,79,000 |
| Anshu Mishra #                               | 0      | 0        | 0        | 13,00,000 | 5,00,000  | 8,00,000  | 0        | 0        | 0        |
| Aahuli Rasik Mistry #                        | 0      | 0        | 0        | 13,50,000 | 0         | 13,50,000 | 0        | 0        | 0        |
| Dipak Dwivedi #                              | 0      | 0        | 0        | 15,31,640 | 31,640    | 15,00,000 | 0        | 5,00,000 | 5,00,000 |
| Swati Agarwal #                              | 0      | 0        | 0        | 16,80,000 | 0         | 16,80,000 | 0        | 0        | 0        |

# denote Manish Mishra Group entities

61. All the entities of Manish Mishra Group have exited the market either in December 13-31, 2022 or in January 2023 except Shri Abhinendra Singh (PAN BSUPS4998G). He sold 7,00,000 shares on January 13, 2023 out of 7,45,000 outstanding shares. Thus, it is reasonably concluded that after having provided the exit to Net Sellers Group, even Manish Mishra Group exited during the period from December 13, 2022 to January 31, 2023.

#### ORDER LOG ANALYSIS

62. Order Log analysis was done to understand the pattern of order placement by the suspected entities during Patch 2 - Video Patch. From the table provided below, it is observed that the suspected entities have placed huge quantities of buy and / or sell orders and subsequently deleted the same. Thus, these entities created order spoofing by deliberately placing such high quantities of buy orders and subsequently deleting the same. This demonstrates that they intended to create artificial depth in the market to entice more and more investors to trade in the scrip of GGENG and hence, aid the net sellers in offloading the shares by creating artificial liquidity.

63. The aforesaid observation of artificial volume/liquidity creation is also supported from the statement recording of Sunil Bhandari, wherein he stated that *"the deal was strucked where Manish Mishra will facilitate the sale/ offload the shares and create*

*liquidity in the scrip of GG Engineering Limited as there was not much liquidity in the scrip of GG. As a pre-condition of the deal between Manish Mishra and Myself, I was supposed to create the depth by placing the buy orders in the morning as per the instructions of Mr. Manish Mishra I and Manish Mishra in our own trading account as well as our wives' trading account created depth and volume which helped to provide the exit and offload the shares to the market where video promotions played a significant role."*

64. Further, the excerpts of the WhatsApp chats between Manish Mishra and Sunil Bhandari given in above points indicate how these entities were involved in creating artificial liquidity in the scrip.
65. From the Order Log analysis, it was observed that 12,402 Unique PANs have placed the orders during December 05, 2022 to December 12, 2022. These 12,402 PANs have together cancelled / deleted 39.81% of their total quantity of orders (Buy and Sell) placed whereas 43 suspected entities have cancelled 41.93% of the total quantity of orders (Buy and Sell) placed. Clients other than 43 suspected entities, cancelled 38.26% of their total quantity of orders (Buy and Sell).
66. **Order placement of 43 suspects** – As seen from the below table, out of 43, 25 suspects have deleted buy and / or sell orders. These 25 suspected entities (out of 43), have deleted around 4,63,85,147 buy orders (buy quantity placed) out of the total buy orders quantity placed (i.e. 9,50,09,459 shares) and deleted 5,31,02,955 sell orders (sell quantity placed) out of the total sell orders quantity placed (i.e. 14,22,36,639). Thus, buy order quantity deletion percentage is 48.82% and sell order quantity deletion percentage is 37.33%.
67. **Order placement of remaining entities (i.e. 12402 – 43)** - It is also observed that other investors have deleted around 3,27,34,634 buy orders (buy quantity placed) out of the total buy orders quantity placed (i.e. 15,10,58,785) and deleted 9,22,38,329 sell orders (sell quantity placed) out of the total sell orders quantity placed (i.e. 17,55,66,096). Thus, buy order quantity deletion percentage is 21.6% and sell order quantity deletion percentage is 52.53%.
68. The order placement and subsequent deletion behaviour of suspects is different from the remaining entities. While suspected entities have roughly deleted 48.82% of buy orders placed, remaining entities have deleted only 21.6% of buy orders placed. This clearly indicates the underlying intent that the suspects did not have any intention to buy the scrip of GGENG and in fact, deleted large buy quantities indicating an attempt to create artificial depth and entice gullible investors to buy the scrip.
69. The above observations with respect to cancelled / deleted quantities / count of buy and sell orders corresponding to all 43 suspects is tabulated in the table below and order log for Patch 2 is provided at **Annexure 19**:



| Name                                           | Total Buy Orders Placed | Total Buy order Available quantity deleted | Total Sell Orders Placed | Total Sell order Available quantity deleted | Total Buy Order Added Count | Total Buy Order Deleted Count | Total Sell Order Added Count | Total Sell Order Deleted Count | Cancelled Volume Percentage (AVLQTY)* | Buy Qty Executed | Sell Quantity Executed |
|------------------------------------------------|-------------------------|--------------------------------------------|--------------------------|---------------------------------------------|-----------------------------|-------------------------------|------------------------------|--------------------------------|---------------------------------------|------------------|------------------------|
| Rekha Bhandari                                 | 2,74,33,894             | 1,98,62,895                                | 3,16,12,833              | 2,20,41,064                                 | 195                         | 65                            | 198                          | 149                            | 70.97                                 | 9664269          | 9664269                |
| Shyam Huf                                      | -                       | NA                                         | 28,89,515                | 12,96,515                                   | 0                           | 0                             | 63                           | 38                             | 44.87                                 | NA               | 1600000                |
| Kishansinh Mansinh Rajput                      | 5,00,000                | 3,07,808                                   | 5,76,495                 | 5,76,495                                    | 20                          | 13                            | 24                           | 24                             | 82.15                                 | 192165           | NA                     |
| Manish Mishra                                  | 1,28,18,039             | 42,74,137                                  | 1,12,12,924              | 32,79,157                                   | 90                          | 27                            | 64                           | 17                             | 31.43                                 | 8255522          | 7933767                |
| Rajan Gupta                                    | 1,65,30,000             | 95,31,499                                  | 1,14,61,168              | 8,36,001                                    | 64                          | 19                            | 38                           | 9                              | 37.04                                 | 6998501          | 10625167               |
| Vrinda Advanced Materials Limited              | 32,50,000               | NA                                         | 1,28,00,000              | 21,50,000                                   | 3                           | 0                             | 17                           | 7                              | 13.40                                 | 3250000          | 10650000               |
| Jayantilal Babulal Ranka                       | 26,000                  | 15,000                                     | 6,35,500                 | 75,000                                      | 5                           | 2                             | 14                           | 6                              | 13.61                                 | 11000            | 535500                 |
| Blue Square Corporate Services Private Limited | -                       | NA                                         | 25,02,247                | 9,50,000                                    | 0                           | 0                             | 10                           | 6                              | 37.97                                 | NA               | 1732247                |
| Vikas Lifecare Limited                         | 22,50,000               | 10,16,334                                  | 1,32,50,000              | 71,03,639                                   | 2                           | 1                             | 14                           | 5                              | 52.39                                 | 1233666          | 6146361                |
| Advik Capital Limited                          | 30,00,000               | NA                                         | 1,25,00,000              | 67,48,557                                   | 2                           | 0                             | 11                           | 5                              | 43.54                                 | 3000000          | 5751443                |
| Charu Sharad Rathi                             | -                       | NA                                         | 19,08,495                | 6,50,000                                    | 0                           | 0                             | 9                            | 5                              | 34.06                                 | NA               | 1483495                |
| Wessel Consultancy Private Limited             | 1,50,446                | NA                                         | 10,00,000                | 8,49,554                                    | 2                           | 0                             | 4                            | 4                              | 73.85                                 | 150446           | 150446                 |
| Jatin Manubhai Shah                            | 13,05,780               | 9,05,780                                   | 11,50,000                | 11,08,487                                   | 14                          | 10                            | 3                            | 3                              | 82.02                                 | 400000           | 41513                  |
| Karavan Tradelink Opc Private Limited Vate     | 10,00,000               | 24,999                                     | 10,24,874                | 74,874                                      | 40                          | 1                             | 41                           | 3                              | 4.93                                  | 974958           | 950000                 |
| Angad Ishwarlal Rathod                         | 46,00,000               | NA                                         | 61,00,000                | 22,79,100                                   | 30                          | 0                             | 9                            | 3                              | 21.30                                 | 4600000          | 3820900                |
| Naresh Aggarwal                                | -                       | NA                                         | 18,50,000                | 2,90,000                                    | 0                           | 0                             | 4                            | 2                              | 15.68                                 | NA               | 1560000                |
| Just Right Life Limited                        | 98,00,000               | 74,65,751                                  | 38,00,000                | 6,50,000                                    | 10                          | 8                             | 8                            | 1                              | 59.67                                 | 1534249          | 3150000                |
| Anshu Mishra                                   | 18,00,000               | 5,00,009                                   | 5,03,523                 | 3,523                                       | 16                          | 5                             | 2                            | 1                              | 21.86                                 | 1300000          | 500000                 |
| Sunil Bhandari                                 | 7,00,000                | 4,70,712                                   | 3,20,646                 | 91,323                                      | 2                           | 2                             | 2                            | 1                              | 55.07                                 | 229323           | 229323                 |
| Nirmal Aggarwal                                | -                       | NA                                         | 15,00,000                | 4,39,304                                    | 0                           | 0                             | 3                            | 1                              | 29.29                                 | NA               | 1060696                |
| Namita Garg                                    | -                       | NA                                         | 41,90,000                | 6,60,362                                    | 0                           | 0                             | 9                            | 1                              | 15.76                                 | NA               | 3529638                |
| Naresh Mittal                                  | -                       | NA                                         | 16,20,000                | 8,00,000                                    | 0                           | 0                             | 7                            | 1                              | 49.38                                 | NA               | 820000                 |
| Sharad Premprakash Rathl                       | -                       | NA                                         | 3,00,000                 | 1,50,000                                    | 0                           | 0                             | 2                            | 1                              | 50.00                                 | NA               | 150000                 |
| Dipak Dwiwedi                                  | 31,00,000               | 15,68,372                                  | 31,640                   | -                                           | 31                          | 16                            | 1                            | 0                              | 50.08                                 | 1531640          | 31640                  |
| Vikas Garg                                     | 10,00,000               | 4,41,851                                   | 12,58,149                | -                                           | 1                           | 1                             | 3                            | 0                              | 19.57                                 | 558149           | 1258149                |
| Aahuti Rasik Mistry                            | 13,50,000               | NA                                         | -                        | NA                                          | 5                           | 0                             | 0                            | 0                              | -                                     | 1350000          | NA                     |
| Vinayak Garg                                   | -                       | NA                                         | 34,00,000                | NA                                          | 0                           | 0                             | 6                            | 0                              | -                                     | NA               | 3400000                |
| Govind Aggarwal                                | -                       | NA                                         | 10,00,000                | NA                                          | 0                           | 0                             | 2                            | 0                              | -                                     | NA               | 1000000                |
| Sonakshi Mittal                                | -                       | NA                                         | 10,00,000                | NA                                          | 0                           | 0                             | 2                            | 0                              | -                                     | NA               | 1000000                |

|                                           |                     |                    |                     |                     |               |              |              |              |               |                    |                    |
|-------------------------------------------|---------------------|--------------------|---------------------|---------------------|---------------|--------------|--------------|--------------|---------------|--------------------|--------------------|
| Meera Chopra                              | 2,70,000            | NA                 | -                   | NA                  | 1             | 0            | 0            | 0            | -             | 270000             | NA                 |
| Krishan Kumar                             | -                   | NA                 | 15,00,000           | NA                  | 0             | 0            | 4            | 0            | -             | NA                 | 1500000            |
| Abhinendra Singh                          | 7,45,000            | NA                 | -                   | NA                  | 27            | 0            | 0            | 0            | -             | 745000             | NA                 |
| Vertika Singh                             | 3,00,000            | NA                 | -                   | NA                  | 3             | 0            | 0            | 0            | -             | 300000             | NA                 |
| Priya Mittal                              | -                   | NA                 | 13,88,500           | NA                  | 0             | 0            | 4            | 0            | -             | NA                 | 1388500            |
| Sharad Kumar Bagga                        | -                   | NA                 | 11,00,000           | NA                  | 0             | 0            | 2            | 0            | -             | NA                 | 1100000            |
| Urvashi Mittal                            | -                   | NA                 | 15,00,000           | NA                  | 0             | 0            | 3            | 0            | -             | NA                 | 1500000            |
| Apoorva Agarwal                           | 3,34,500            | NA                 | -                   | NA                  | 5             | 0            | 0            | 0            | -             | 329500             | NA                 |
| Swati Agarwal                             | 16,15,800           | NA                 | -                   | NA                  | 18            | 0            | 0            | 0            | -             | 1680000            | NA                 |
| Vijay Ghanshyambhai Pujara                | -                   | NA                 | 15,01,130           | NA                  | 0             | 0            | 6            | 0            | -             | NA                 | 1501130            |
| Seema Garg                                | 10,00,000           | NA                 | 13,40,000           | NA                  | 1             | 0            | 2            | 0            | -             | 1000000            | 1340000            |
| Vishesh Gupta                             | -                   | NA                 | 3,00,000            | NA                  | 0             | 0            | 1            | 0            | -             | NA                 | 300000             |
| Skse Securities Limited Corp Cmtm Prop Ac | 1,30,000            | NA                 | 12,09,000           | NA                  | 2             | 0            | 7            | 0            | -             | 130000             | 1209000            |
| Sandeep Bansal                            | -                   | NA                 | 10,00,000           | NA                  | 0             | 0            | 2            | 0            | -             | NA                 | 1000000            |
| <b>Total of Suspects</b>                  | <b>9,50,09,459</b>  | <b>4,63,85,147</b> | <b>14,22,36,639</b> | <b>5,31,02,955</b>  | <b>589</b>    | <b>170</b>   | <b>601</b>   | <b>293</b>   | <b>41.93%</b> | <b>4,96,88,388</b> | <b>8,96,13,184</b> |
| <b>Market Total</b>                       | <b>24,60,68,244</b> | <b>7,91,19,781</b> | <b>31,78,02,735</b> | <b>14,53,41,284</b> | <b>22,856</b> | <b>1,993</b> | <b>6,218</b> | <b>2330</b>  | <b>39.81%</b> |                    |                    |
| <b>Other Investors</b>                    | <b>15,10,58,785</b> | <b>3,27,34,634</b> | <b>17,55,66,096</b> | <b>9,22,38,329</b>  | <b>22,267</b> | <b>1,823</b> | <b>5,617</b> | <b>2,037</b> | <b>38.26%</b> |                    |                    |

**70. Order Placement by certain sample entities** - On sample basis, analysis of order placement pattern is provided below for certain suspected entities. The activities of these suspected entities indicate an attempt to create artificial volume by placing large orders and subsequently deleting the same is alleged to be designed to create a misleading appearance of demand and supply in the market and to attract gullible investors.

#### 70.1 Sunil Bhandari and Rekha Bhandari

Sunil Bhandari, trading through his wife's account, has placed 195 buy orders and deleted 65 buy orders, while he placed 198 sell orders and deleted 149 sell orders. For details, order log is placed at **Annexure 19**. On analysis of the order placement of Rekha Bhandari during Patch 2, the following details are placed datewise:

|            | Buy Orders |         |          |          | Sell Orders |         |          |         | Buy Qty Executed | Sell Qty Executed |
|------------|------------|---------|----------|----------|-------------|---------|----------|---------|------------------|-------------------|
|            | Count      |         | Quantity |          | Count       |         | Quantity |         |                  |                   |
| Order Date | Added      | Deleted | Added    | Deleted  | Added       | Deleted | Added    | Deleted |                  |                   |
| 2022-12-06 | 69         | 17      | 6622260  | 3758780  | 28          | 22      | 6675230  | 3293750 | 3606480          | 3606480           |
| 2022-12-07 | 16         | 10      | 2306633  | 1652374  | 28          | 25      | 6451838  | 5797314 | 654524           | 654524            |
| 2022-12-08 | 84         | 29      | 13655001 | 10651741 | 120         | 83      | 8985760  | 4500000 | 4353260          | 4353260           |
| 2022-12-09 | 9          | 8       | 3800000  | 3300000  | 6           | 3       | 1750005  | 1250000 | 500005           | 500005            |

|            |    |   |         |        |    |    |         |         |        |        |
|------------|----|---|---------|--------|----|----|---------|---------|--------|--------|
| 2022-12-12 | 17 | 1 | 1050000 | 500000 | 16 | 16 | 7750000 | 7200000 | 550000 | 550000 |
|------------|----|---|---------|--------|----|----|---------|---------|--------|--------|

This demonstrates that Ms Rekha Bhandari has entered both buy and sell orders and subsequently deleted them to a large extent. Some of the sample orders placed, updated and / or deleted are provided in the table below:

- Order ID 1670297400000002661 was placed on 09:15:48.507442, updated 5 times in around 17 minutes and subsequently deleted in 20 seconds (since last updation).
- Order ID 1670297400000138878 was placed on 09:25:26.968864, updated thrice in 7 minutes and subsequently deleted in 49 seconds (since last updation).
- Order ID 1670297400000168867 was placed at 09:39:01.557603, updated in 12 seconds and deleted in 3 minutes (since last updation).

| ORDERID             | ORDER_DATE | ORDER_TIME      | RATE | QTY    | AVLQTY | BUYSELL | ERRORTXT                   |
|---------------------|------------|-----------------|------|--------|--------|---------|----------------------------|
| 1670297400000002661 | 06-12-2022 | 09:15:48.507442 | 1.94 | 200000 | 200000 | S       | ORDER ADDED SUCCESSFULLY   |
| 1670297400000002661 | 06-12-2022 | 09:16:55.498989 | 1.94 | 200000 | 180000 | S       | ORDER UPDATED SUCCESSFULLY |
| 1670297400000002661 | 06-12-2022 | 09:18:48.169775 | 1.94 | 200000 | 162000 | S       | ORDER UPDATED SUCCESSFULLY |
| 1670297400000002661 | 06-12-2022 | 09:26:12.704742 | 1.94 | 200000 | 48600  | S       | ORDER UPDATED SUCCESSFULLY |
| 1670297400000002661 | 06-12-2022 | 09:29:34.399400 | 1.94 | 200000 | 43700  | S       | ORDER UPDATED SUCCESSFULLY |
| 1670297400000002661 | 06-12-2022 | 09:33:29.144329 | 1.94 | 200000 | 39330  | S       | ORDER UPDATED SUCCESSFULLY |
| 1670297400000002661 | 06-12-2022 | 09:33:49.660692 | 1.94 | 200000 | 35380  | S       | ORDER DELETED SUCCESSFULLY |
| ORDERID             | ORDER_DATE | ORDER_TIME      | RATE | QTY    | AVLQTY | BUYSELL | ERRORTXT                   |
| 1670297400000138878 | 06-12-2022 | 09:25:26.968864 | 1.94 | 250000 | 250000 | S       | ORDER ADDED SUCCESSFULLY   |
| 1670297400000138878 | 06-12-2022 | 09:26:26.407589 | 1.94 | 250000 | 225000 | S       | ORDER UPDATED SUCCESSFULLY |
| 1670297400000138878 | 06-12-2022 | 09:29:49.288210 | 1.94 | 250000 | 180000 | S       | ORDER UPDATED SUCCESSFULLY |
| 1670297400000138878 | 06-12-2022 | 09:33:02.662795 | 1.94 | 250000 | 162000 | S       | ORDER UPDATED SUCCESSFULLY |
| 1670297400000138878 | 06-12-2022 | 09:33:51.588458 | 1.94 | 250000 | 162000 | S       | ORDER DELETED SUCCESSFULLY |
| ORDERID             | ORDER_DATE | ORDER_TIME      | RATE | QTY    | AVLQTY | BUYSELL | ERRORTXT                   |
| 1670297400000168867 | 06-12-2022 | 09:39:01.557603 | 1.93 | 50000  | 50000  | B       | ORDER ADDED SUCCESSFULLY   |
| 1670297400000168867 | 06-12-2022 | 09:39:13.694133 | 1.93 | 500000 | 500000 | B       | ORDER UPDATED SUCCESSFULLY |
| 1670297400000168867 | 06-12-2022 | 09:42:54.747033 | 1.93 | 500000 | 500000 | B       | ORDER DELETED SUCCESSFULLY |

It is also observed that in the following instances while trading on behalf of his wife Rekha Bhandari, Sunil Bhandari placed around 29 orders (buy / sell orders) in pre-open session, updated 3 orders as seen from order IDs and subsequently deleted these 29 orders during the preopen session itself. The aforesaid details are provided in the table below:

| ORDER_DATE | ORDER_TIME | ORDERNO             | BUY/SELL | RATE | QTY      | AVLQTY   | AUDCODE | AUDTEXT                    |
|------------|------------|---------------------|----------|------|----------|----------|---------|----------------------------|
| 06/12/2022 | 9.05.45 AM | 1670297400000002470 | S        | 1.94 | 1,00,000 | 1,00,000 | A       | Order Added Successfully   |
| 06/12/2022 | 9.06.15 AM | 1670297400000002470 | S        | 1.94 | 1,00,000 | 1,00,000 | D       | Order Deleted Successfully |
| 06/12/2022 | 9.05.47 AM | 1670297400000002471 | S        | 1.94 | 1,00,000 | 1,00,000 | A       | Order Added Successfully   |



|            |            |                     |   |      |          |          |   |                            |
|------------|------------|---------------------|---|------|----------|----------|---|----------------------------|
| 06/12/2022 | 9.06.15 AM | 1670297400000002471 | S | 1.94 | 1,00,000 | 1,00,000 | D | Order Deleted Successfully |
| 06/12/2022 | 9.05.49 AM | 1670297400000002472 | S | 1.94 | 1,00,000 | 1,00,000 | A | Order Added Successfully   |
| 06/12/2022 | 9.06.10 AM | 1670297400000002472 | S | 1.94 | 1,00,000 | 1,00,000 | D | Order Deleted Successfully |
| 06/12/2022 | 9.05.52 AM | 1670297400000002473 | S | 1.94 | 1,00,000 | 1,00,000 | A | Order Added Successfully   |
| 06/12/2022 | 9.06.10 AM | 1670297400000002473 | S | 1.94 | 1,00,000 | 1,00,000 | D | Order Deleted Successfully |
| 07/12/2022 | 9.00.01 AM | 1670383800000001166 | B | 1.9  | 2,00,000 | 2,00,000 | A | Order Added Successfully   |
| 07/12/2022 | 9.04.25 AM | 1670383800000001166 | B | 1.9  | 2,00,000 | 2,00,000 | D | Order Deleted Successfully |
| 07/12/2022 | 9.00.01 AM | 1670383800000001167 | B | 1.9  | 2,00,000 | 2,00,000 | A | Order Added Successfully   |
| 07/12/2022 | 9.04.25 AM | 1670383800000001167 | B | 1.9  | 2,00,000 | 2,00,000 | D | Order Deleted Successfully |
| 07/12/2022 | 9.00.01 AM | 1670383800000001168 | B | 1.9  | 2,00,000 | 2,00,000 | A | Order Added Successfully   |
| 07/12/2022 | 9.04.25 AM | 1670383800000001168 | B | 1.9  | 2,00,000 | 2,00,000 | D | Order Deleted Successfully |
| 07/12/2022 | 9.00.01 AM | 1670383800000001169 | B | 1.9  | 2,00,000 | 2,00,000 | A | Order Added Successfully   |
| 07/12/2022 | 9.04.25 AM | 1670383800000001169 | B | 1.9  | 2,00,000 | 2,00,000 | D | Order Deleted Successfully |
| 07/12/2022 | 9.00.01 AM | 1670383800000001170 | B | 1.9  | 2,00,000 | 2,00,000 | A | Order Added Successfully   |
| 07/12/2022 | 9.04.25 AM | 1670383800000001170 | B | 1.9  | 2,00,000 | 2,00,000 | D | Order Deleted Successfully |
| 07/12/2022 | 9.00.01 AM | 1670383800000001172 | B | 1.9  | 2,00,000 | 2,00,000 | A | Order Added Successfully   |
| 07/12/2022 | 9.04.25 AM | 1670383800000001172 | B | 1.9  | 2,00,000 | 2,00,000 | D | Order Deleted Successfully |
| 07/12/2022 | 9.00.01 AM | 1670383800000001173 | B | 1.9  | 2,00,000 | 2,00,000 | A | Order Added Successfully   |
| 07/12/2022 | 9.04.25 AM | 1670383800000001173 | B | 1.9  | 2,00,000 | 2,00,000 | D | Order Deleted Successfully |
| 07/12/2022 | 9.00.01 AM | 1670383800000001174 | B | 1.9  | 2,00,000 | 2,00,000 | A | Order Added Successfully   |
| 07/12/2022 | 9.04.25 AM | 1670383800000001174 | B | 1.9  | 2,00,000 | 2,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.00.01 AM | 1670470200000003034 | B | 1.93 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 08/12/2022 | 9.06.27 AM | 1670470200000003034 | B | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.00.01 AM | 1670470200000003035 | B | 1.93 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 08/12/2022 | 9.06.27 AM | 1670470200000003035 | B | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.00.01 AM | 1670470200000003036 | B | 1.93 | 50,000   | 50,000   | A | Order Added Successfully   |
| 08/12/2022 | 9.00.07 AM | 1670470200000003036 | B | 1.93 | 5,00,000 | 5,00,000 | U | Order Updated Successfully |
| 08/12/2022 | 9.06.27 AM | 1670470200000003036 | B | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.00.01 AM | 1670470200000003037 | B | 1.93 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 08/12/2022 | 9.06.27 AM | 1670470200000003037 | B | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.00.01 AM | 1670470200000003038 | B | 1.93 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 08/12/2022 | 9.06.27 AM | 1670470200000003038 | B | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.00.49 AM | 1670470200000003139 | B | 1.92 | 50,000   | 50,000   | A | Order Added Successfully   |
| 08/12/2022 | 9.01.19 AM | 1670470200000003139 | B | 1.92 | 5,00,000 | 5,00,000 | U | Order Updated Successfully |
| 08/12/2022 | 9.06.27 AM | 1670470200000003139 | B | 1.92 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.00.52 AM | 1670470200000003143 | B | 1.92 | 50,000   | 50,000   | A | Order Added Successfully   |
| 08/12/2022 | 9.01.15 AM | 1670470200000003143 | B | 1.92 | 5,00,000 | 5,00,000 | U | Order Updated Successfully |
| 08/12/2022 | 9.06.27 AM | 1670470200000003143 | B | 1.92 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.00.58 AM | 1670470200000003144 | B | 1.92 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 08/12/2022 | 9.06.27 AM | 1670470200000003144 | B | 1.92 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.02.24 AM | 1670470200000003167 | B | 1.9  | 5,00,000 | 5,00,000 | A | Order Added Successfully   |

*(Signature)*

|            |            |                     |   |      |          |          |   |                            |
|------------|------------|---------------------|---|------|----------|----------|---|----------------------------|
| 08/12/2022 | 9.06.27 AM | 1670470200000003167 | B | 1.9  | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.02.27 AM | 1670470200000003168 | B | 1.9  | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 08/12/2022 | 9.06.27 AM | 1670470200000003168 | B | 1.9  | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 08/12/2022 | 9.02.30 AM | 1670470200000003169 | B | 1.9  | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 08/12/2022 | 9.06.27 AM | 1670470200000003169 | B | 1.9  | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 12/12/2022 | 9.05.15 AM | 1670815178160001194 | B | 1.93 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 12/12/2022 | 9.05.17 AM | 1670815178160001194 | B | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 12/12/2022 | 9.04.44 AM | 1670815178160001185 | S | 1.93 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 12/12/2022 | 9.05.08 AM | 1670815178160001185 | S | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 12/12/2022 | 9.04.47 AM | 1670815178160001187 | S | 1.93 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 12/12/2022 | 9.05.08 AM | 1670815178160001187 | S | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 12/12/2022 | 9.04.52 AM | 1670815178160001190 | S | 1.93 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 12/12/2022 | 9.05.08 AM | 1670815178160001190 | S | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 12/12/2022 | 9.04.56 AM | 1670815178160001191 | S | 1.93 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 12/12/2022 | 9.05.08 AM | 1670815178160001191 | S | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |
| 12/12/2022 | 9.04.58 AM | 1670815178160001192 | S | 1.93 | 5,00,000 | 5,00,000 | A | Order Added Successfully   |
| 12/12/2022 | 9.05.08 AM | 1670815178160001192 | S | 1.93 | 5,00,000 | 5,00,000 | D | Order Deleted Successfully |

Sunil Bhandari, while trading in his own account, has placed buy and orders in the following manner:

| Total Buy Orders Placed | Total Buy order Available quantity deleted | Total Sell Orders Placed | Total Sell order Available quantity deleted | Total Buy Order Added Count | Total Buy Order Deleted Count | Total Sell Order Added Count | Total Sell Order Deleted Count | Cancelled Volume Percentage (AVLQTY) | Buy Qty Executed | Sell Quantity Executed |
|-------------------------|--------------------------------------------|--------------------------|---------------------------------------------|-----------------------------|-------------------------------|------------------------------|--------------------------------|--------------------------------------|------------------|------------------------|
| 7,00,000                | 4,70,712                                   | 3,20,646                 | 91,323                                      | 2                           | 2                             | 2                            | 1                              | 55.07                                | 229323           | 229323                 |

In the following 4 instances of order placement, it is seen that in 2 cases he kept updating the orders before deleting the same. The orders were updated with very minor quantities as reflected below clearly indicating an intent of not executing the same:

| ORDERID             | ORDER_DATE | ORDER_TIME      | RATE | QTY    | AVLQTY | BUYSELL | AUDCODE | ERRORTTEXT                 |
|---------------------|------------|-----------------|------|--------|--------|---------|---------|----------------------------|
| 1670470200000003414 | 08-12-2022 | 09:18:18.256452 | 1.91 | 500000 | 500000 | B       | A       | Order Added Successfully   |
| 1670470200000003414 | 08-12-2022 | 09:20:57.949446 | 1.9  | 500000 | 270677 | B       | U       | Order Updated Successfully |
| 1670470200000003414 | 08-12-2022 | 09:21:05.741324 | 1.91 | 500000 | 270677 | B       | U       | Order Updated Successfully |
| 1670470200000003414 | 08-12-2022 | 09:27:27.002817 | 1.91 | 500016 | 270693 | B       | U       | Order Updated Successfully |
| 1670470200000003414 | 08-12-2022 | 09:37:40.521155 | 1.9  | 500016 | 270693 | B       | U       | Order Updated Successfully |
| 1670470200000003414 | 08-12-2022 | 09:37:50.695812 | 1.91 | 500018 | 270695 | B       | U       | Order Updated Successfully |
| 1670470200000003414 | 08-12-2022 | 10:05:26.654010 | 1.9  | 500018 | 270695 | B       | U       | Order Updated Successfully |
| 1670470200000003414 | 08-12-2022 | 10:05:29.654914 | 1.91 | 500018 | 270695 | B       | U       | Order Updated Successfully |
| 1670470200000003414 | 08-12-2022 | 11:30:35.010879 | 1.9  | 500021 | 270698 | B       | U       | Order Updated Successfully |
| 1670470200000003414 | 08-12-2022 | 11:30:37.621910 | 1.91 | 500021 | 270698 | B       | U       | Order Updated Successfully |
| 1670470200000003414 | 08-12-2022 | 12:14:49.509894 | 1.9  | 500021 | 270698 | B       | U       | Order Updated Successfully |
| 1670470200000003414 | 08-12-2022 | 12:14:52.310287 | 1.91 | 500021 | 270698 | B       | U       | Order Updated Successfully |

|                     |            |                 |      |        |        |   |   |                            |
|---------------------|------------|-----------------|------|--------|--------|---|---|----------------------------|
| 167047020000003414  | 08-12-2022 | 13:15:06.785240 | 1.91 | 500021 | 270698 | B | D | Order Deleted Successfully |
| 167047020000003425  | 08-12-2022 | 09:18:35.693666 | 1.91 | 200000 | 200000 | B | A | Order Added Successfully   |
| 167047020000003425  | 08-12-2022 | 09:20:53.341122 | 1.9  | 200000 | 200000 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 09:21:01.525110 | 1.91 | 200000 | 200000 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 09:27:21.619826 | 1.91 | 200009 | 200009 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 09:37:37.734688 | 1.9  | 200009 | 200009 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 09:37:45.848509 | 1.91 | 200010 | 200010 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 10:05:23.550498 | 1.9  | 200009 | 200009 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 10:05:32.382246 | 1.91 | 200009 | 200009 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 11:30:30.721963 | 1.9  | 200009 | 200009 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 11:30:40.641196 | 1.91 | 200009 | 200009 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 12:14:44.925802 | 1.9  | 200014 | 200014 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 12:15:00.222352 | 1.91 | 200014 | 200014 | B | U | Order Updated Successfully |
| 167047020000003425  | 08-12-2022 | 13:15:06.756612 | 1.91 | 200014 | 200014 | B | D | Order Deleted Successfully |
| 167047020000003745  | 08-12-2022 | 09:31:18.210204 | 1.92 | 229323 | 229323 | S | A | Order Added Successfully   |
| 167047020000003745  | 08-12-2022 | 13:19:22.741722 | 1.92 | 229323 | 91323  | S | D | Order Deleted Successfully |
| 1670470200000461801 | 08-12-2022 | 13:19:52.445586 | 1.91 | 91323  | 91323  | S | A | Order Added Successfully   |

## 70.2 Manish Mishra and Anshu Mishra

The order placement and deletion pattern of Sunil Bhandari and Rekha Bhandari was also seen in the case of Manish Mishra and Anshu Mishra. For details of their order placement / deletion, order log is provided at Annexure 19.

Following are some sample instances from order placement pattern wherein Manish Mishra placed the buy and sell orders and subsequently deleted them:

| ORDERID            | ORDER_DATE | ORDER_TIME      | RATE | QTY    | AVLQTY | BUYSELL | AUDCODE | ERRORTXT                   |
|--------------------|------------|-----------------|------|--------|--------|---------|---------|----------------------------|
| 167029740000002055 | 06-12-2022 | 09:00:00.263297 | 1.92 | 100000 | 100000 | B       | A       | Order Added Successfully   |
| 167029740000002055 | 06-12-2022 | 09:17:31.821321 | 1.92 | 100005 | 59909  | B       | U       | Order Updated Successfully |
| 167029740000002055 | 06-12-2022 | 09:19:38.905737 | 1.88 | 100005 | 59909  | B       | U       | Order Updated Successfully |
| 167029740000002055 | 06-12-2022 | 15:30:00.006082 | 1.88 | 100005 | 59909  | B       | D       | Order Deleted Successfully |
| 167029740000002056 | 06-12-2022 | 09:00:00.263315 | 1.92 | 100000 | 100000 | B       | A       | Order Added Successfully   |
| 167029740000002056 | 06-12-2022 | 09:18:14.018107 | 1.92 | 100005 | 100005 | B       | U       | Order Updated Successfully |
| 167029740000002056 | 06-12-2022 | 09:19:38.902770 | 1.88 | 100005 | 100005 | B       | U       | Order Updated Successfully |
| 167029740000002056 | 06-12-2022 | 15:30:00.006082 | 1.88 | 100005 | 100005 | B       | D       | Order Deleted Successfully |
| 167029740000002057 | 06-12-2022 | 09:00:00.263740 | 1.92 | 100000 | 100000 | B       | A       | Order Added Successfully   |
| 167029740000002057 | 06-12-2022 | 09:18:18.714146 | 1.92 | 100011 | 100011 | B       | U       | Order Updated Successfully |
| 167029740000002057 | 06-12-2022 | 09:19:38.900250 | 1.88 | 100011 | 100011 | B       | U       | Order Updated Successfully |
| 167029740000002057 | 06-12-2022 | 15:30:00.006082 | 1.88 | 100011 | 100011 | B       | D       | Order Deleted Successfully |
| 167029740000002058 | 06-12-2022 | 09:00:00.263763 | 1.92 | 100000 | 100000 | B       | A       | Order Added Successfully   |
| 167029740000002058 | 06-12-2022 | 09:18:23.223210 | 1.92 | 100010 | 100010 | B       | U       | Order Updated Successfully |
| 167029740000002058 | 06-12-2022 | 09:19:38.898262 | 1.88 | 100010 | 100010 | B       | U       | Order Updated Successfully |
| 167029740000002058 | 06-12-2022 | 15:30:00.006082 | 1.88 | 100010 | 100010 | B       | D       | Order Deleted Successfully |

|                     |            |                 |      |        |        |   |   |                            |
|---------------------|------------|-----------------|------|--------|--------|---|---|----------------------------|
| 1670297400000002059 | 06-12-2022 | 09:00:00.263794 | 1.92 | 40000  | 40000  | B | A | Order Added Successfully   |
| 1670297400000002059 | 06-12-2022 | 09:18:27.739246 | 1.92 | 40011  | 40011  | B | U | Order Updated Successfully |
| 1670297400000002059 | 06-12-2022 | 09:19:38.855304 | 1.88 | 40011  | 40011  | B | U | Order Updated Successfully |
| 1670297400000002059 | 06-12-2022 | 15:30:00.006082 | 1.88 | 40011  | 40011  | B | D | Order Deleted Successfully |
| 1670297400000002538 | 06-12-2022 | 09:15:02.152063 | 1.76 | 200000 | 200000 | B | A | Order Added Successfully   |
| 1670297400000002538 | 06-12-2022 | 16:00:00.000188 | 1.76 | 200000 | 200000 | B | D | Order Deleted Successfully |
| 1670297400000002539 | 06-12-2022 | 09:15:02.167442 | 1.76 | 200000 | 200000 | B | A | Order Added Successfully   |
| 1670297400000002539 | 06-12-2022 | 16:00:00.000188 | 1.76 | 200000 | 200000 | B | D | Order Deleted Successfully |
| 1670297400000002541 | 06-12-2022 | 09:15:02.182256 | 1.76 | 200000 | 200000 | B | A | Order Added Successfully   |
| 1670297400000002541 | 06-12-2022 | 16:00:00.000188 | 1.76 | 200000 | 200000 | B | D | Order Deleted Successfully |
| 1670297400000002542 | 06-12-2022 | 09:15:02.197702 | 1.76 | 200000 | 200000 | B | A | Order Added Successfully   |
| 1670297400000002542 | 06-12-2022 | 16:00:00.000188 | 1.76 | 200000 | 200000 | B | D | Order Deleted Successfully |
| 1670297400000002543 | 06-12-2022 | 09:15:02.213252 | 1.76 | 200000 | 200000 | B | A | Order Added Successfully   |
| 1670297400000002543 | 06-12-2022 | 16:00:00.000188 | 1.76 | 200000 | 200000 | B | D | Order Deleted Successfully |
| 1670383800000420370 | 07-12-2022 | 12:35:09.841018 | 1.84 | 28509  | 28509  | S | A | Order Added Successfully   |
| 1670383800000420370 | 07-12-2022 | 13:11:02.630727 | 1.84 | 28509  | 28509  | S | D | Order Deleted Successfully |
| 1670383800000420371 | 07-12-2022 | 12:35:26.640122 | 1.84 | 200000 | 200000 | S | A | Order Added Successfully   |
| 1670383800000420371 | 07-12-2022 | 13:11:02.522370 | 1.84 | 200000 | 200000 | S | D | Order Deleted Successfully |
| 1670383800000420372 | 07-12-2022 | 12:35:28.592207 | 1.84 | 200000 | 200000 | S | A | Order Added Successfully   |
| 1670383800000420372 | 07-12-2022 | 13:11:02.645903 | 1.84 | 200000 | 200000 | S | D | Order Deleted Successfully |
| 1670383800000420374 | 07-12-2022 | 12:35:30.326549 | 1.84 | 200000 | 200000 | S | A | Order Added Successfully   |
| 1670383800000420374 | 07-12-2022 | 13:11:02.660898 | 1.84 | 200000 | 200000 | S | D | Order Deleted Successfully |

### 70.3 Rajan Gupta

He is one of the top net sellers and demonstrated that despite net sell he placed huge buy orders and then subsequently updated and / or deleted them. As observed from order log, during the Patch 2 period, on sample basis, the following are observations which are self explanatory:

- He deleted 57.66% of the buy orders placed.
- On December 5, 2022, 12 buy orders (12 Order IDs) were placed for 60,00,000 shares out of which 11 orders (11 Order IDs) of total 55,00,000 shares were deleted.
- A sample instance provided below indicates that Order ID 1670383800000345640 was updated twice after which it was finally deleted.

| Name        | Total Buy Orders Placed | Total Buy order quantity deleted | Total Sell Orders Placed | Total Sell order quantity deleted | Total Buy Order Added Count | Total Buy Order Deleted Count | Total Sell Order Added Count | Total Sell Order Deleted Count |
|-------------|-------------------------|----------------------------------|--------------------------|-----------------------------------|-----------------------------|-------------------------------|------------------------------|--------------------------------|
| RAJAN GUPTA | 1,65,30,000             | 95,31,499                        | 1,14,61,168              | 8,36,001                          | 64                          | 19                            | 38                           | 9                              |

| ORDERID             | ORDER_DATE | ORDER_TIME      | RATE | QTY    | AVLQTY | BUYSELL | ERRORTXT                   |
|---------------------|------------|-----------------|------|--------|--------|---------|----------------------------|
| 1670383800000345640 | 07-12-2022 | 11:35:34.301641 | 1.96 | 500000 | 500000 | S       | Order Added Successfully   |
| 1670383800000345640 | 07-12-2022 | 12:01:32.338222 | 2    | 500000 | 500000 | S       | Order Updated Successfully |
| 1670383800000345640 | 07-12-2022 | 12:20:31.301116 | 1.84 | 500000 | 500000 | S       | Order Updated Successfully |
| 1670383800000345640 | 07-12-2022 | 13:26:10.513187 | 1.84 | 500000 | 225833 | S       | Order Deleted Successfully |

#### 70.4 Shyam HUF

Shyam HUF placed only sell orders that too only on December 5, 2022 out of the 6 trading days in Patch 2. Out of 63 sell orders placed for 28,89,515 shares, 38 orders for 12,96,515 shares were deleted. For details, order log is placed at **Annexure 19**.

Sample instances are provided in the table below:

- Order ID 1670211000001044901 for sell of 1,00,000 shares placed on 12:32:03.565793 was deleted in 6 seconds.
- Order ID 1670211000001044930 for 5,00,000 shares placed at 12:35:36.651806 was deleted in 5 seconds.

| ORDERID             | ORDER_DATE | ORDER_TIME      | RATE | QTY    | AVLQTY | BUYSELL | ERRORTXT                   |
|---------------------|------------|-----------------|------|--------|--------|---------|----------------------------|
| 1670211000001044901 | 05-12-2022 | 12:32:03.565793 | 1.85 | 100000 | 100000 | S       | Order Added Successfully   |
| 1670211000001044901 | 05-12-2022 | 12:32:09.153705 | 1.85 | 100000 | 100000 | S       | Order Deleted Successfully |
| 1670211000001044930 | 05-12-2022 | 12:35:36.651806 | 1.85 | 500000 | 500000 | S       | Order Added Successfully   |
| 1670211000001044930 | 05-12-2022 | 12:35:41.933260 | 1.85 | 500000 | 500000 | S       | Order Deleted Successfully |

#### 70.5 Kishansinh Mansinh Rajput

The order placement and deletion pattern of Kishansinh Mansinh Rajput is as under:

| Name                      | Total Buy Orders Placed | Total Buy order Available quantity deleted | Total Sell Orders Placed | Total Sell order Available quantity deleted | Total Buy Order Added Count | Total Buy Order Deleted Count | Total Sell Order Added Count | Total Sell Order Deleted Count | Cancelled Volume Percentage (AVLQTY)* | Buy Qty Executed | Sell Quantity Executed |
|---------------------------|-------------------------|--------------------------------------------|--------------------------|---------------------------------------------|-----------------------------|-------------------------------|------------------------------|--------------------------------|---------------------------------------|------------------|------------------------|
| Kishansinh Mansinh Rajput | 5,00,000                | 3,07,808                                   | 5,76,495                 | 5,76,495                                    | 20                          | 13                            | 24                           | 24                             | 82.15                                 | 192165           | NA                     |

He deleted the entire quantity of sell orders placed and there was no sell trades in his account in Patch 2. Further, he has also deleted 61.56% of buy orders placed. This clearly indicates that he had no intention to execute the trades but create a false appearance of both demand and supply and thus, artificial appearance of trading in the market. Sample order placement and deletion pattern for Kishansinh Mansinh Rajput is provided below:

| ORDERID             | ORDER_DATE | ORDER_TIME      | RATE | QTY   | AVLQTY | BUYSELL | ERRORTXT                   |
|---------------------|------------|-----------------|------|-------|--------|---------|----------------------------|
| 1670383800000331878 | 07-12-2022 | 11:32:56.417476 | 1.84 | 25000 | 25000  | B       | Order Added Successfully   |
| 1670383800000331878 | 07-12-2022 | 12:06:51.969239 | 1.84 | 24999 | 24999  | B       | Order Updated Successfully |
| 1670383800000331878 | 07-12-2022 | 12:18:42.988062 | 1.84 | 24999 | 24999  | B       | Order Deleted Successfully |
| 1670383800000331884 | 07-12-2022 | 11:33:06.965975 | 1.84 | 25000 | 25000  | B       | Order Added Successfully   |
| 1670383800000331884 | 07-12-2022 | 12:06:40.741448 | 1.84 | 24999 | 24999  | B       | Order Updated Successfully |
| 1670383800000331884 | 07-12-2022 | 12:18:42.986606 | 1.84 | 24999 | 24999  | B       | Order Deleted Successfully |

### Summary of observations on Order Log Analysis

71. Instances of 25 suspected entities who have placed orders and subsequently deleted may be seen from the order log placed at **Annexure 19**. Entities have also updated the orders placed before deleting the same.

71.1 The above order placement pattern suggests that the suspected entities (25 out of 43 suspects) were involved in building up the buy and / or sell side of order book to create artificial liquidity and entice innocent investors to trade in the scrip and provide a platform to net sellers to sell the shares by creating artificial depth and liquidity in the scrip of GGENG. Placing orders in such a way that portrayed existence of sufficient buyers and sellers in the market influenced the trading decisions of other investors in the scrip of GGENG pursuant to the video upload. The above tables under Order Analysis Section of this Report shows that the suspected entities created spoofing by deliberately placing such high quantities of buy and / or sell orders and subsequently deleting the same. Hence, the entities indulged in an act which created false and misleading appearance of trading.

71.2 Entities like Kishansinh Mansinh Rajput deleted the entire sell orders so placed, Rajan Gupta deleted 57.66% of the buy orders placed, Vikas Lifecare deleted substantial chunk of buy and sell orders aggregating to 52.39%, Wessel Consultancy Pvt. Ltd. deleted 84.96% of the sell orders placed, Jatin Shah deleted 96.4% of the sell orders placed and 69.4% of buy orders placed, Just Right Life deleted 76.2% of buy orders placed, Dipak Dwivedi deleted 50.6% of the buy orders placed. For order placement and deleted quantities for entities, Table 39 may be referred.

71.3 Thus, out of these 25 entities, some entities have huge deletions on buy side and some have huge deletions on sell side and some entities have huge deletions on both buy and sell side. Thus, it is clear that these 25 suspected entities (out of 43) have placed and deleted orders with a view to create artificial depth by managing both demand and supply side, thereby creating misleading appearance of trading in the market. This misleading appearance led to new investors' trade in the scrip of GGENG and thereby, aided the Net Sellers Group to offload the shares pursuant to the video upload on December 4, 2022.

**Based on the above it has been alleged that the below mentioned 25 Noticees involved in order spoofing as above have violated Section 12A(a), (b) and (c) of SEBI Act 1992 read with Regulations 3(a), (b), (c) and (d), 4(1) and 4(2)(a) of PFUTP Regulations. The names of these 25 Noticees are provided below:**

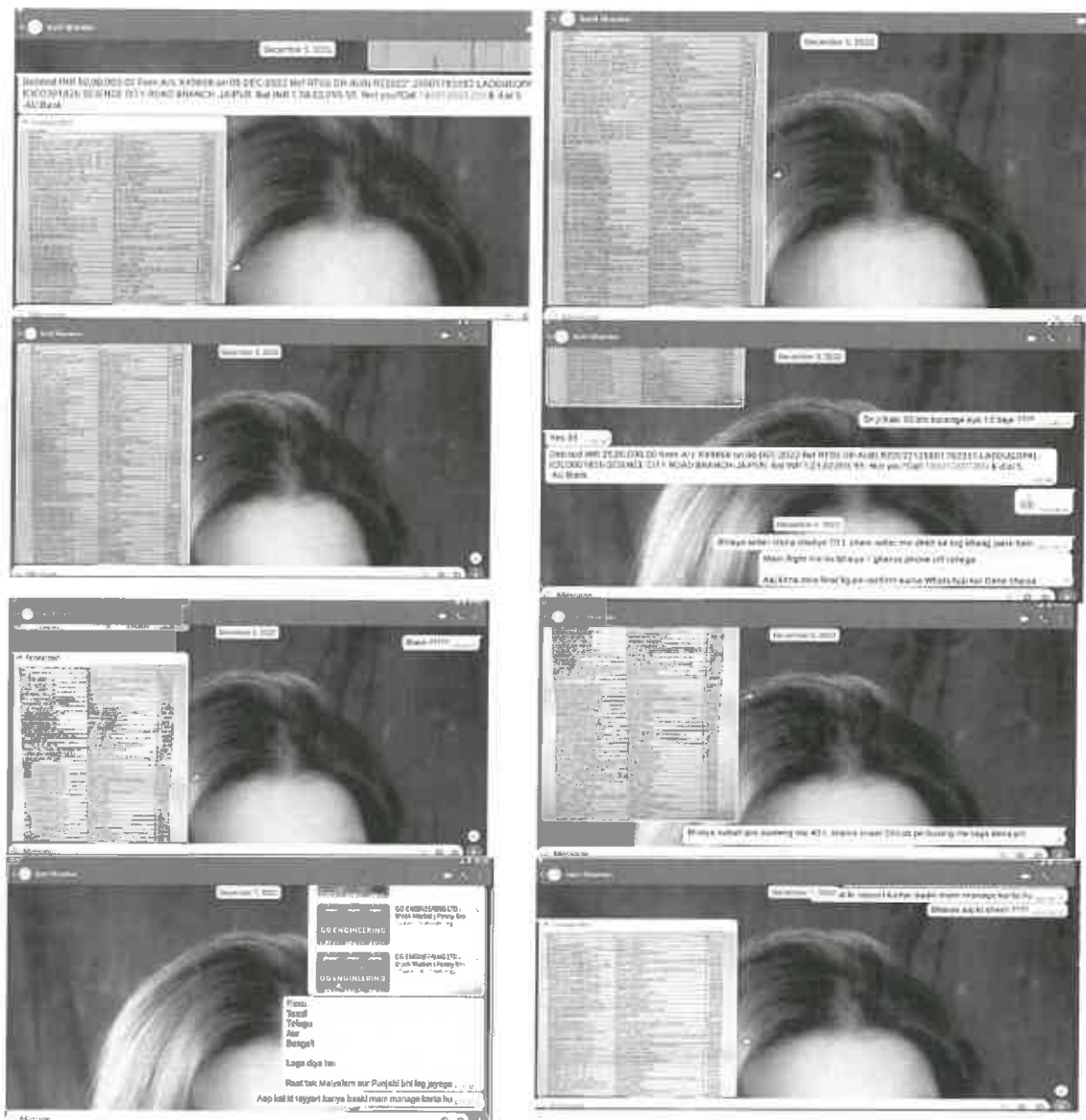
| S.No. | Name                          | S.No. | Name                                           |
|-------|-------------------------------|-------|------------------------------------------------|
| 1     | Ms. Rekha Bhandari            | 14    | M/s Karavan Tradelink Opc Private Limited Vate |
| 2     | M/s Shyam HUF                 | 15    | Mr. Angad Ishwarlal Rathod                     |
| 3     | Mr. Kishansinh Mansinh Rajput | 16    | Mr. Naresh Aggarwal                            |
| 4     | Mr. Manish Mishra             | 17    | M/s Just Right Life Limited                    |
| 5     | Mr. Rajan Gupta               | 18    | Ms. Anshu Mishra                               |

|    |                                                    |    |                              |
|----|----------------------------------------------------|----|------------------------------|
| 6  | M/s Vrindaa Advanced Materials Limited             | 19 | Mr. Sunil Bhandari           |
| 7  | Mr. Jayantlal Babulal Ranka                        | 20 | Ms. Nirmal Aggarwal          |
| 8  | M/s Blue Square Corporate Services Private Limited | 21 | Ms. Namita Garg              |
| 9  | M/s Vikas Lifecare Limited                         | 22 | Mr. Naresh Mittal            |
| 10 | M/s Advik Capital Limited                          | 23 | Mr. Sharad Premprakash Rathi |
| 11 | Ms. Charu Sharad Rathi                             | 24 | Mr. Dipak Dwiwedi            |
| 12 | M/s Wessel Consultancy Private Limited             | 25 | Mr. Vikas Garg               |
| 13 | Ms. Jatin Manubhai Shah                            |    |                              |

### MODUS OPERANDI ADOPTED BY THE SUSPECTED ENTITIES

72. Two videos were uploaded on December 4, 2022 with respect to buy recommendation in the scrip of GGENG. These videos contained certain misleading information about GGENG having secured 600 crores worth of orders from West Bengal Government and the price of the scrip touching Rs.20/- in 3 months and Rs.100/- in one year. After the videos were uploaded on December 4, 2022 (i.e. Sunday), the volumes in the scrip of GGENG rocketed. However, the price impact on the scrip was not significant. The videos received more than 20,00,000 counts as informed by Google in its response.
73. It is important to point out certain aspects of WhatsApp chats between Shri Sunil Bhandari and Shri Manish Mishra (as gathered as to how these entities have been exchanging intricate details about their approach towards trading in the scrip of GGENG:
- On December 6, 2022, Manish Mishra tells Sunil Bhandari to reduce the quantity placed on sell side. He adds that looking at 10 lakh shares, investors run away ("*Bhaiya seller chota daliye 10 lakh share seller me dekh ke log bhaag jate hain*").
  - On December 6, 2022, Manish Mishra asks Bhandari to inform him on WhatsApp as to how much shares were sold today ("*aaj kitna bika final figure confirm karke WhatsApp kar dena bhaiya*").
  - On December 6, 2022, Manish Mishra tells Bhandari to put 40 lakh shares in lower circuit on buy side in pre open session ("*Bhaiya subah pre opening me 40 L shares lower Circuit pe buying me laga dena plz*").
  - On December 7, 2022, Manish Mishra informs Bhandari about posting of videos in various languages – Hindi, Tamil, Telugu and Bengali and by evening to be posted in Punjabi and Malayalam.
  - On December 9, 2022, Manish Mishra discusses impact of videos run in southern languages such that there were more buyers from South India which can be seen from the surnames mentioned in the sheet shared by Bhandari.
  - Sunil Bhandari has also been forwarding to Manish Mishra a sheet containing names of buyers and sellers in GGENG for various days. This sheet appears to be a forwarded message which was received by Bhandari.

- On December 11, 2022 (i.e. Sunday), Manish Mishra instructs Bhandari on buying limits for preopen session for December 12, 2022 including the quantity and price. He also mentions that all such orders should be placed before 09:01AM. Further, he also mentions that from day after tomorrow the shares will be sold in huge quantities even more than being sold now.
- However, as also informed by Shri Bhandari during statement recording, their deal broke and their plan failed as the price was not moving. The same can be seen from the WhatsApp chats between them dated December 13 and 14, 2022 wherein Shri Mishra tells Shri Bhandari that he has not been answering his call and not been arranging for funds.





74. It is also important to note the statement made by Shri Sunil Bhandari at the time of statement recording that as part of the deal, he and Manish Mishra was to provide the liquidity help certain investors offload the shares as part of the deal. Further, he also stated that *“I and Manish Mishra in our own trading account as well as our wives’ trading account created depth and volume which helped to provide the exit and offload the shares to the market where video promotions played a significant role”*. Further, *“...Since the offloaders wanted an exit that too at a high price but as the price rise did not happen, the said deal broke”*.

75. Thus, both Manish Mishra and Sunil Bhandari, alongwith other suspected entities played major role in creating liquidity wherein buy and sell side volumes were were managed and artificial liquidity was created by them. With the videos and rise in volumes more and more gullible investors fell prey to the scheme and commenced

C

trading in the scrip of GGENG. With increase in volumes, the entities in the Net Sellers Group offloaded the shares to the maximum extent possible. It is also seen that they exited even when the price was not significant. Hence, creation of artificial liquidity helped them offload the shares / dump the shares to innocent investors and exit the scrip of GGENG. The net buyers of Manish Mishra Group also completely offloaded by January 31, 2023.

76. Order log analysis also indicates the pattern of generating interest in the scrip by certain suspected entities. The orders were placed on both buy and sell side and subsequently deleted. This scheme thus 'spoofed' gullible investors who fell prey to the scheme.

77. Hence, this pattern allegedly indicates volumes about the trading behaviour of all such entities put together. Uploading of video with false and misleading information on YouTube, ensuring buy and sell side volumes and when enough buying interest is generated helping certain investors of Net Sellers Group to offload the shares.

78. There appears a huge desperation to sell the shares by Net Sellers Group as seen from their trading pattern in Patch 2 i.e. after having generated substantial buying interest in the scrip even when the price was not attractive. Hence, it is alleged that the matter pertains to a case of volume creation / manipulation without much impact on the price. In such cases, calculation of illgotten gains may not be a reasonable point as the idea was to provide exit as soon as possible. As the volumes were less in Patch 1, the Net Sellers Group could not offload the shares and hence, this well-orchestrated scheme / artifice to generate interest was devised to aid the Net Sellers Group to provide exit and offload the shares of GGENG.

79. It is alleged that Sunil Bhandari is the main link between Net Sellers Group and Manish Mishra Group. He had contacts with both Groups through himself or entities Srestha Finvest Ltd. and Sunstar Realty Development Ltd.

80. In the statement recordings, both Manish Mishra and Sunil Bhandari informed that their scheme failed. The same is substantiated in terms of WhatsApp chats December 13, 2022 wherein despite requests from Manish Mishra, Sunil Bhandari did not respond to his calls or did not arrange for cash.

#### RESPONSES OF TOP 10 NET SELLERS

81. Responses were sought from top 10 net sellers (excluding Rajan Gupta as his statement was recorded) and their responses in brief is tabulated below (details of responses received is provided in **Annexure 14**:

| S.No. | PAN        | Client Name                            | Responses in brief                                                                     |
|-------|------------|----------------------------------------|----------------------------------------------------------------------------------------|
| 1.    | AAECP4144R | M/s Vrindaa Advanced Materials Limited | • Response not received                                                                |
| 2.    | AADCA5571A | M/s Vikas Lifecare Limited             | • Shri Vikas Garg and Mr Vivek Garg are the promoters and shareholders of the company. |

|     |            |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----|------------|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |            |                                                    | <ul style="list-style-type: none"> <li>There were some transactions entered into by their company with GGENG. Details are provided at Annexure 14.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3.  | AEEPG8794H | Mr. Rajan Gupta                                    | <ul style="list-style-type: none"> <li>Statement recorded and attached as Annexure 13</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 4.  | AAOPJ0181H | Ms. Namita Garg                                    | <ul style="list-style-type: none"> <li>Investment decisions are taken by her spouse Shri Vivek Garg.</li> <li>Investment in GGENG was made from open market and through Right Issue.</li> <li>Rajan Gupta is the friend of her spouse Shri Vivek Garg</li> <li>Shri Vikas Garg is brother of Shri Vivek Garg, and Ms. Seema Garg is wife of Shri Vikas Garg</li> <li>She is not connected to GGENG/its promoters / its directors /Sunil Bhandari / Manish Mishra</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 5.  | AQQPG5523N | Mr. Vinayak Garg                                   | <ul style="list-style-type: none"> <li>Rajan Gupta is friend of his father (Shri Vivek Garg)</li> <li>Shri Vikas Garg is Uncle (brother of Shri Vivek Garg), and Ms. Seema Garg is Aunt (wife of Shri Vikas Garg)</li> <li>He is not connected with GGENG/its promoters / its directors /Sunil Bhandari / Manish Mishra</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 6.  | AAACQ0004H | M/s . Advik Capital Limited                        | <ul style="list-style-type: none"> <li>As NBFC, they source funds through their own capital, borrowed funds, and inter corporate loans. These funds are then utilized for their trading and lending activities. During the normal course of business, they gave a loan to Wessel Consultancy Pvt. Ltd., as per the agreement. Copy of the agreement and ledger details is attached as Annexure 14.</li> <li>On May 18, 2022, the erstwhile promoters, Shri Virender Agarwal and Shri Shakul Kumar Agarwal, entered into a Share Purchase Agreement with Shri Vikas Garg along with Ms. Seema Garg, and Ms. Sukriti Garg (together referred to the Acquirers) to sell their entire stake in Advik Capital Limited. Following this agreement, the acquirers made an open offer to acquire up to 26% of the total voting shares from public shareholders, as per the Letter of Offer dated February 6, 2023. Upon the completion of the open offer and the Share Purchase Agreement, the Acquirers—Shri Vikas Garg, Ms. Seema Garg, and Ms. Sukriti Garg—took control of the Company, becoming the new Promoters and Promoter Group. Currently, Shri Vikas Garg serves as the Executive Director and is a key promoter of the Company, holding 12.67% of its shares.</li> </ul> |
| 7.  | AADCB4038M | M/s Blue Square Corporate Services Private Limited | <ul style="list-style-type: none"> <li>They had bought some stock of GGENG from market for which they got Rights Entitlement and they applied for the same.</li> <li>Directors and promoters of their company are Sharad Rath and Charu Rath since inception.</li> <li>Shri Jayanti Bhabulal Ranka is a friend of Sharad Rath</li> <li>Sharad Rath knows Vikas Garg socially</li> <li>They do not know Sunil Bhandari or Manish Mishra</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 8.  | AAWCS8320E | M/s Just Right Life Limited                        | <ul style="list-style-type: none"> <li>Their company has no affiliation or association with GGENG, its promoters, or its directors.</li> <li>They have no such relationship with Sunil Bhandari, Srestha Finance Ltd. and Sunstar Realty Development, Manish Mishra, Anshu Mishra, Laddu Gopal Ventures Private Limited.</li> <li>Vrindaa Advance Material Limited is a shareholder in their company, and they have commercial transactions and a business relationship with Vrindaa as well.</li> <li>They have engaged in commercial transactions with Wessel Consultancy Pvt. Ltd.(details attached), but Shri Rajan Gupta is not known to them.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 9.  | ABAHS7715R | M/s Shyam HUF                                      | <ul style="list-style-type: none"> <li>They are not associated / connected with GGENG, its Directors, its promoters.</li> <li>They are not connected with Sunil Bhandari, Srestha Finance Ltd. and Sunstar Realty Development, Manish Mishra, Anshu Mishra, Laddu Gopal Ventures Private Limited.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 10. | ABJPK5857F | Mr. Naresh Aggarwal                                | <ul style="list-style-type: none"> <li>In August 2022, GGENG announced right issue @ Rs. 1.80/- per share, but in that period the market price was approx. Rs. 3.25/- per share. Keeping in view the difference between these rates, he purchased the shares.</li> <li>Seema Garg is daughter of his sister and Vikas Garg is husband of Seema Garg.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

82. These manipulative actions by Sunil Bhandari and Manish Mishra in collusion with 41 other suspected entities from both Net Sellers Group and Manish Mishra Group not only hampered the fair functioning of the securities market but also distorted

trading patterns and eroded the integrity of the trading platform, further emphasizing their role in facilitating the unlawful exit of the Net Sellers Group. Such activities interfered with free and fair market operations, severely hampered the process of normal trading behaviour on the exchange platform, and ultimately leading to innocent investors falling prey to such premeditated well-orchestrated scheme.

In view of the findings of the investigation as given above, it has been alleged that Noticee 1 in collusion with Noticees 2 to 43 engaged in a coordinated scheme to induce investors to acquire securities of GGENG through uploading the false and misleading videos in the YouTube Channels. As part of the scheme, the Noticees in Net Sellers Group (i.e. Noticees 2 – 10, 12 – 28) and Manish Mishra Group (i.e. Noticees 1, 11, 29 – 43) created artificial volumes with a view to aid Noticees in the Net Seller Group to offload the shares of GGENG acquired in rights issue or otherwise. Further, Noticees 1 – 5, 7 – 10, 14, 18, 22 – 24, 26 – 27, 29 – 33, 39 – 41 and 43 have allegedly entered into order spoofing, thereby leading to creation of misleading appearance of trading in the shares of GGENG.

The above acts are allegedly in violation of Section 12A(a), (b) and (c) of the SEBI Act read with Regulation 3(a), (b), (c), (d) and Regulation 4(1) and 4(2) (a), (k) and (r) of the PFUTP Regulations.

83. The text of the said provisions are given below :

### **SEBI Act, 1992**

#### **PROHIBITION OF MANIPULATIVE AND DECEPTIVE DEVICES, INSIDER TRADING AND SUBSTANTIAL ACQUISITION OF SECURITIES OR CONTROL**

*Prohibition of manipulative and deceptive devices, insider trading and substantial acquisition of securities or control.*

**12A. No person shall directly or indirectly—**

*(a) use or employ, in connection with the issue, purchase or sale of any securities listed or proposed to be listed on a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of this Act or the rules or the regulations made thereunder;*

*(b) employ any device, scheme or artifice to defraud in connection with issue or dealing in securities which are listed or proposed to be listed on a recognised stock exchange;*

*(c) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person, in connection with the issue, dealing in securities which are listed or proposed to be listed on a recognised stock exchange, in contravention of the provisions of this Act or the rules or the regulations made thereunder;*

### **PFUTP Regulations**

#### **3. Prohibition of certain dealings in securities**

*No person shall directly or indirectly—*

*(a) buy, sell or otherwise deal in securities in a fraudulent manner;*

(b) use or employ, in connection with issue, purchase or sale of any security listed or proposed to be listed in a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of the Act or the rules or the regulations made there under;

(c) employ any device, scheme or artifice to defraud in connection with dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange;

(d) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person in connection with any dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange in contravention of the provisions of the Act or the rules and the regulations made there under.

**4. Prohibition of manipulative, fraudulent and unfair trade practices**

(1) Without prejudice to the provisions of regulation 3, no person shall indulge in a manipulative, fraudulent or an unfair trade practice in securities markets.

(2) Dealing in securities shall be deemed to be a manipulative fraudulent or an unfair trade practice if it involves any of the following:—

(a) knowingly indulging in an act which creates false or misleading appearance of trading in the securities market;

(k) disseminating information or advice through any media, whether physical or digital, which the disseminator knows to be false or misleading in a reckless or careless manner and which is designed to, or likely to influence the decision of investors dealing in securities

(r) knowingly planting false or misleading news which may induce sale or purchase of securities.

84. The allegations as mentioned above, if established, make the Noticees liable for monetary penalty under Section 15HA of SEBI Act. You are, therefore, called upon to show cause as to why an inquiry should not be held against you in terms of Rule 4 of Adjudication Rules read with section 15I of SEBI Act for the aforesaid alleged violations.

85. The provisions of the above Sections are reproduced hereunder:

**Penalty for fraudulent and unfair trade practices.**

**15HA.** If any person indulges in fraudulent and unfair trade practices relating to securities, he shall be liable to a penalty which shall not be less than five lakh rupees but which may extend to twenty-five crore rupees or three times the amount of profits made out of such practices, whichever is higher.

86. Your reply, if any, should reach the undersigned, at the address given below, within 14 days from the date of the receipt of this notice, and also through email at [amitk@sebi.gov.in](mailto:amitk@sebi.gov.in) and [jayeetar@sebi.gov.in](mailto:jayeetar@sebi.gov.in), failing which it shall be presumed that you have no reply to submit and the matter would be further proceeded with

on the basis of the evidence available on record in terms of rule 4(7) of Adjudication Rules.

**Securities and Exchange Board of India**

SEBI Bhavan II, Plot No. C7, 'G' Block,  
Bandra Kurla Complex, Bandra (East)  
Mumbai – 400 051.

87. You may also note that a settlement mechanism is provided under the Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018. If you wish to avail benefit of the settlement process, you may apply for the same in the manner provided in the said regulations under intimation to the undersigned.

88. You are advised to provide copies of your PAN, Phone Number and Email ID(s) and also to keep the undersigned informed about the change in the correspondence address, if any, till the proceedings are complete.

  
**AMIT KAPOOR**  
Adjudicating Officer

Encls.:

**List of Annexures**

|                    |                                                                                        |
|--------------------|----------------------------------------------------------------------------------------|
| <b>Annexure 1</b>  | Copy of communique appointing Adjudicating Officer                                     |
| <b>Annexure 2</b>  | Details of the rights issue like corporate announcements, allotment details            |
| <b>Annexure 3</b>  | Price volume data during IP                                                            |
| <b>Annexure 4</b>  | Two Downloaded videos provided by BSE with respect to link mentioned in the complaints |
| <b>Annexure 5</b>  | Reply of FusionNet & Google                                                            |
| <b>Annexure 6</b>  | Statement of Shri Manish Mishra                                                        |
| <b>Annexure 7</b>  | Bank statement of Kotak Mahindra Bank                                                  |
| <b>Annexure 8</b>  | Letter dated January 7, 2023 of GGENG to BSE                                           |
| <b>Annexure 9</b>  | WhatsApp chats between Shri Manish Mishra and Shri Sunil Bhandari                      |
| <b>Annexure 10</b> | Bank Statements                                                                        |
| <b>Annexure 11</b> | Reply of Broker                                                                        |
| <b>Annexure 12</b> | Off market details mentioned at para 38                                                |
| <b>Annexure 13</b> | Statement of Shri Rajan Gupta                                                          |
| <b>Annexure 14</b> | Responses received from net sellers                                                    |
| <b>Annexure 15</b> | Statement of Shri Sunil Bhandari                                                       |
| <b>Annexure 16</b> | WhatsApp chats between Shri Manish Mishra and Ms. Aahuti Rashik Mistry                 |
| <b>Annexure 17</b> | KYC AOF details of Karavan Tradelink OPC Pvt. Ltd                                      |



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|--------------------|---------------------------------------------------------------|
| <b>Annexure 18</b> | WhatsApp chats between Shri Manish Mishra and Shri Jatin Shah |
| <b>Annexure 19</b> | Order Log for Patch 2                                         |